February 25, 2005

Mr. Mano K. Nazar American Electric Power Senior Vice President and Chief Nuclear Officer Indiana Michigan Power Company Nuclear Generation Group One Cook Place Bridgman, MI 49106

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST TO EXTEND ALLOWED OUTAGE TIMES (TAC NOS. MC4525 AND MC4526)

Dear Mr. Nazar:

The U. S. Nuclear Regulatory Commission (NRC) staff has reviewed your license amendment request dated September 21, 2004, (ML042780478) to extend the allowed outage times for the emergency diesel generators, 69 kV offsite power circuit, component cooling water, and essential service water, and has identified areas where additional information is needed to complete its review. Enclosed is the NRC staff's request for additional information.

The items in the Enclosure were discussed with Mr. Waters of your staff, and a mutually agreeable target date of within 45 days of the date of this letter for your response was established. If you have any questions, please contact me at (301) 415-2296.

Sincerely,

/RA/

Carl F. Lyon, Project Manager, Section 1 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure: As stated

cc w/ encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

EXTENSION OF ALLOWED OUTAGE TIMES FOR EMERGENCY DIESEL GENERATORS,

69 KV OFFSITE POWER CIRCUIT, COMPONENT COOLING WATER, AND ESSENTIAL

SERVICE WATER

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

INDIANA MICHIGAN POWER COMPANY

DOCKET NOS. 50-315 AND 50-316

By letter dated September 21, 2004, the Indiana Michigan Power Company proposed changes to Donald C. Cook Nuclear Plant (CNP) Units 1 and 2 Technical Specifications (TS) for extending the allowed outage time (AOT) from the current 3 days to 14 days for emergency diesel generator (EDG) and 69kV offsite power source. In order for the staff to proceed with its review of the proposed change, the following information is needed:

- 1. Please discuss the communication protocol that has been established between the control room operator at CNP and the transmission system operator. Is the transmission system operator notified in advance that the EDG is going to be taken out of service for an extended period of time?
- 2. Please explain why your compensatory measures listed on page 16 of Attachment 1 are adequate. Do you intend to make them regulatory commitments? Please address the regulatory commitments listed below, which have been typically provided for past EDG AOT extension requests.
 - A. The local area weather conditions will be evaluated prior to entering the extended EDG AOT for voluntary planned maintenance. An extended EDG AOT will not be entered for voluntary planned maintenance purposes if weather forecasts for the local area are predicting severe weather conditions that could affect the switchyard or offsite power supply during the AOT.
 - B. The condition of the switchyard, offsite power supply, and the grid will be evaluated prior to entering the extended AOT for elective maintenance. An extended EDG AOT will not be entered to perform elective maintenance when grid stress conditions are high such as during extreme summer temperatures and/or high demand.
 - C. No discretionary switchyard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary, or startup transformers associated with the unit.
 - D. No maintenance or testing that affects the reliability of the train associated with the OPERABLE EDG will be scheduled during the

extended AOT. If any testing and maintenance activities must be performed while the extended AOT is in effect, a 10 CFR 50.65(a)(4) evaluation will be performed.

E. After entering the extended AOT, the Supplemental Diesel Generator (SDG) will be verified available every 8 hours and treated as protected equipment.

The staff notes that you propose to verify availability every 72 hours. Please justify why a 72 hour verification is appropriate for CNP and why the SDG will not be treated as protected equipment.

- F. The turbine driven emergency feed water pump will not be taken out of service for planned maintenance activities and will be treated as protected equipment.
- G. Should a severe weather warning be issued for the local area that could affect the switchyard or offsite power supply during the AOT, an operator will be available locally at the SDG should local operation of the SDG be required as a result of on-site weather-related damage.
- 3. Your submittal states on page 12, 3rd bullet, "the SDG will have the capacity to power at least one train of vital equipment needed to ensure that safe shutdown following an SBO can be maintained." Please compare the load and power requirements of the SDG to the EDG. In addition, specify the time it will take to manually connect the SDG to the safety bus.
- 4. Discuss your reliability and unavailability goals established for the SDGs. In addition, discuss how often SDGs will be tested to maintain the established reliability goals. Would these goals be monitored under the maintenance rule? Please describe and justify your proposed testing and testing frequency.
- 5. Please discuss why a permanent change to the CNP TS is required to perform one-time maintenance activities on the alternate offsite circuit. Also, provide justification for extending the AOT to 14 days with respect to Regulatory Guide 1.93.
- 6. It is the staff's understanding that the 69kV power source is designated as one of the offsite power sources. However, the staff notes after reviewing the updated final safety analysis report that transformer TR12EP-1, which is powered from the 69kV source, is sized only to power one train of the engineered safeguards equipment in one unit while supplying one train of shutdown equipment in the other unit. It is not clear to the staff how this source satisfies the requirements of GDC-17 with regard to capacity. Please provide the design-basis for your 345kV and 69kV systems.
- 7. It is stated that the SDGs will be available prior to removing the EDG from service for the extended preplanned maintenance work or prior to exceeding the 72 hours AOT for the extended unplanned corrective maintenance work. Does this mean

that the SDG will be tested to assure its operability before an EDG is declared inoperable? Please clarify.

- 8. It is stated that the EDGs are demonstrating adequate reliability. Please provide the current reliability and unavailability of the EDGs at CNP. Also, evaluate how these actual values relate to the target values committed to for station blackout conditions.
- 9. The staff notes that there appears to be inconsistency between the proposed changes to the current TS and the revised current draft Improved Technical Specifications (ITS) with regard to (1) the availability of the SDGs and one of the offsite power sources during the extended AOT of the essential service water system, and (2) the availability of the SDGs as a condition for taking the EDG out of service for the extended AOT. Please explain how the proposed changes to current TS and your draft ITS are consistent, or propose appropriate changes to make them consistent.
- 10. The staff notes that the proposed change does not include TS requirements of verification that the required systems, subsystems, trains, components, and devices that depend on the remaining EDG during the extended EDG AOT. Please explain this apparent omission.

CC:

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