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NUCLEAR REGULATORY COMMISSION

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October 22, 2001

MEMORANDUM FOR: John W. Craig, Assistant for Operations  
Office of the Executive Director for Operations

FROM: Niles C. Chokshi, Chief *Niles C. Chokshi*  
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Office of Nuclear Regulatory Research /

SUBJECT: "COOK CONTAINMENT WALLS"

In accordance with your memorandum of October 2, 2001, I have reviewed the technical information presented in Dr. Landsman's e-mail. In addition, I have also reviewed June 25, 2001, NRR memorandum on results of its follow-up review of the DPO Panel Report recommendations, and summary of June 11, 2001, public meeting regarding D.C. Cook containment structural issues. This summary forms the primary basis for views expressed in Dr. Landsman's e-mail.

Concern

The following is my summary of concerns expressed by Dr. Landsman.

Based on the Summary of June 11, 2001, meeting, Dr. Landsman believes that the licensee is probably still using unacceptable methods and assumptions to analyze containment walls for design basis requirements, and walls are still unacceptable and do not meet our requirements.

Evaluation

In Section 2.1.2 of its report (transmitted to the EDO on March 2, 2001), the DPO Panel addressed the issue of operability determination evaluation (ODE) for the Unit 2 containment subcompartment walls. The panel in Section 2.1.3 concluded that, ".....that the staff's position on the subject walls, although considered degraded, are capable of fulfilling their safety function and are operable, consistent with the provisions of GL 91-18, Rev. 1, was reasonable and appropriate." The basis for the Panel's conclusion was the staff's reliance on its own calculations as well as inherent conservatism in the transient mass distribution (TMD) analysis. The Panel explored the details of TMD conservatism to some extent. In the June 25, 2001, memorandum, NRR has further summarized this information.

The Summary of June 11, 2001, meeting (dated June 28, 2001, SUBJECT: DONALD C. COOK NUCLEAR POWER PLANT - SUMMARY OF JUNE 11, 2001, PUBLIC MEETING REGARDING CONTAINMENT STRUCTURAL ISSUES) states that the licensee presented information related to the design and licensing basis of containment structures which were regarded as degraded but operable since the restart of both units at D.C. Cook. The Summary further states that the licensee indicated that all calculations concerning the containment structures had been

D-11

completed and the analyses confirmed that all containment structures have adequate margin and comply with the design basis requirements as stated in the D.C.Cook Updated Final Safety Analysis Report (UFSAR). The Summary ends with the statement that "No regulatory decisions or commitments were requested or made during the meeting." The licensee's handout (view graphs) are attached to the Summary. This handout includes some limited information on the criteria/assumptions used by the licensee for the design basis evaluation.

My review of the above information does not indicate any impact on the DPO Panel's conclusion regarding the operability determination. As stated earlier, the DPO had relied upon the staff's analysis which had not used some of the assumptions listed in Dr. Landsman's e-mail. Also, the information presented in June 11, 2001, meeting, is related to the design basis evaluation.

My review indicates that the licensee's handout does not contain enough information such that one can determine the complete details of the licensee's design basis analysis. Therefore, one cannot conclude that the licensee has used unacceptable methods and assumptions solely based on the Summary of June 11, 2001, meeting. If no further information is available beyond the June 11, 2001 meeting, it may be beneficial to conduct a review of the licensee's design basis analysis methods and calculations to fully understand their details. This review and its documentation will help clarify any confusion that may exist between what was used and required for the operability evaluation and what is being used and required for the design basis assessment.

Conclusion

There is no new information in Dr. Landsman's e-mail or the Summary of June 11, 2001, meeting that impact the DPO Panel conclusions regarding the operability evaluation.

Please let me know if you need additional information.

*methods & assumptions  
for calculation of*