

January 14, 2008

Mr. Michael W. Rencheck
Senior Vice President and
Chief Nuclear Officer
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

SUBJECT: D. C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED AMENDMENT TO REDUCE MAXIMUM VENTILATION SYSTEM FILTER PRESSURE DROP (TAC NOS. MD5931 AND MD5932)

Dear Mr. Rencheck:

In a letter dated June 13, 2007, Indiana Michigan Power Company submitted the subject application for amendment. The Nuclear Regulatory Commission (NRC) staff reviewed the information transmitted by that letter and has generated draft questions, which had been e-mailed to your staff on September 18, 2007 (Agencywide Document Access and Management System Accession No. ML072640058). The NRC staff discussed the draft questions with your staff in a telephone conference on January 10, 2008. After the discussion, the NRC staff finalized the questions into a request for additional information (RAI) enclosed.

Please respond to the RAI within 30 days of the date of this letter. Feel free to contact me if you need clarification of this RAI.

Sincerely,

/RA/

Peter S. Tam, Senior Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure:
Request for Additional Information

cc: See next page

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DATE	1/11/08	1/11/08	9/13/07*	1/14/08

*RAI transmitted by memo of 9/13/07.

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REQUEST FOR ADDITIONAL INFORMATION

D.C. COOK NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-315 AND 50-316

Reference: Letter, J. N. Jensen to NRC, June 13, 2007
(ADAMS Accession No. ML071730047)

The licensee determined that the existing acceptance values in the Technical Specifications (TS) are non-conservative. The licensee implemented administrative controls to impose a more restrictive acceptance criterion than the TS acceptance values pending issuance of the requested amendment. The licensee stated that calculations for the proposed surveillance testing acceptance criteria are based on applicable fan curves and ventilation industry handbook data on system and component resistances. The allowable filter pressure drop is based on filter vendor recommendations.

The NRC staff agrees that the existing non-conservative acceptance criterion should be revised. However, per 10 CFR Part 50.36(c)(3), the NRC staff believes that the acceptance criterion should be based on the total filter assembly pressure drop needed to assure the required minimum air flows. Filter vendor recommendations should be used to determine when to replace individual banks of filters. In order to complete the evaluation of this license amendment, the NRC staff needs the following additional information:

- (1) Are the calculated maximum allowable filter assembly pressure drop for the various systems greater than the combined filter vendors' recommended maximum pressure drop values?
- (2) How do the handbook resistance values compare with the "as installed" and "as operated" pressure loss values? Are the "as installed" pressure loss values from a testing and balancing (TAB) report?
- (3) The licensee indicated that the "less than 4 inches water gauge" acceptance criterion is based on vendor recommended values for the HEPA/charcoal adsorber assembly. Are pre-filters installed? If pre-filters are installed, why are they not included in the filter assembly total allowable pressure drop?
- (4) If testing (TAB or ANSI N509 §8.5.1) has not been performed, how does the licensee assure that the ventilation systems will provide the required minimum air flow at the requested maximum (less than 4 inches water gauge) filter assembly pressure drop?

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