

**From:** Tam, Peter  
**Sent:** Monday, October 18, 2010 7:07 AM  
**To:** mkscarpello@aep.com; 'hletheridge@aep.com'; jrwaters@aep.com  
**Cc:** Torres, Roberto; Dennig, Robert; Pascarelli, Robert  
**Subject:** D.C. Cook Units 1 and 2 - Draft RAI re. the proposed amendment concerning containment spray nozzle surveillance (TAC ME4125 and ME4126)

Michael:

The NRC staff is reviewing your application for amendment regarding containment spray nozzle surveillance requirements, dated 6/22/10. We would like to discuss with you the following questions/comments in a conference call. In the conference call we will discuss with you the disposition of these questions/comments, including a target date for your formal response.

The submittal states that "There have been; instances at CNP where water was discovered dripping from one or more spray nozzles located above the containment lower ventilation units in the lower containment annular region. Investigations determined this can occur if a valve relied upon to isolate a portion of the system leaks by, or if the heat exchanger tubes are not completely drained after being leak tested during a refueling outage. An inspection was performed inside the spray ring for the Unit 1 west train after discovery of dripping water."

The NRC staff notes that there is no discussion of similar events occurring in Unit 2. Along with the review of the licensee's request to revise the testing frequency for the containment spray nozzles from "10 years" to "following maintenance that could result in nozzle blockage," the NRC staff has to assess if there is high confidence that spray nozzles are unobstructed as of the last flow test. In order to provide reasonable assurance that the potential for nozzle obstruction is acceptably low, please provide the following information:

- (1) A description of any events where active boric acid have been identified in containment for which it appeared to be coming from the Unit 2 containment spray annulus.
- (2) A summary of the containment spray system's past history at Unit 2 as of the last flow test (performed in 2000).
- (3) Description of the corrective action plan in the event of inadvertent fluid flow through the containment spray nozzles. Please note that inadvertent fluid flow through the spray nozzles increases the likelihood of solid boric acid and corrosion type debris accumulation in the spray lines or nozzles which could result in the obstruction of flow paths.

**The sole purpose of this e-mail is to prepare you and others for the proposed conference call. This e-mail does not formally request for additional information, and does not convey a formal NRC staff position.**

**Peter S. Tam**

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(for D. C. Cook and Monticello)  
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