



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 6, 2013

Mr. Lawrence J. Weber
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 – STAFF
ASSESSMENT IN RESPONSE TO RECOMMENDATION 9.3 OF THE NEAR-
TERM TASK FORCE RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR
POWER PLANT ACCIDENT (TAC NOS. ME9950 AND ME9951)

Dear Mr. Weber:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Section 50.54, Paragraph (f) of Title 10 of the *Code of Federal Regulations* (10 CFR), regarding Recommendations 2.1 (seismic and flooding evaluations), 2.3 (seismic and flooding walkdowns), and 9.3 (emergency preparedness communication and staffing) of the Near Term Task Force (NTTF) review of insights from the Fukushima Dai-ichi accident. With respect to Recommendation 9.3, Enclosure 5 to the NRC's letter requested licensees to assess their means to power communications equipment onsite and offsite during a prolonged station blackout event and to perform a staffing study to determine the staff required to fill all necessary positions in response to a multi-unit event.

By letter dated October 31, 2012, Indiana Michigan Power Company (I&M, the licensee) responded to this request for Donald C. Cook Nuclear Plant (CNP), Units 1 and 2. Generic technical concerns were issued by the NRC in a letter dated January 23, 2013 (ADAMS Accession No. ML13016A111). The licensee supplemented its response in a letter dated February 22, 2013.

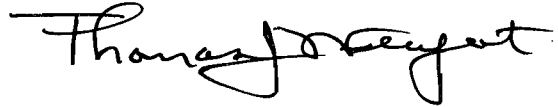
The NRC staff has reviewed the communications assessments for CNP and, as documented in the enclosed staff analysis, determined that the assessment for communications is reasonable, and the analyzed existing systems, proposed enhancements, and interim measures will help to ensure that communications are maintained. Further, in coordination with the NTTF Recommendation 4.2 (Mitigation Strategies), the NRC staff is planning to follow up with I&M to confirm that upgrades to the site's communications systems have been completed.

L. Weber

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If you have any questions, please contact me at (301) 415-4037 or by e-mail at Thomas.Wengert@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Wengert". The signature is written in a cursive style with a large initial 'T' and a long horizontal stroke extending to the left.

Thomas J. Wengert, Senior Project Manager
Plant Licensing Branch LPLIII-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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SAFETY ASSESSMENT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

ASSESSMENT OF COMMUNICATIONS IN RESPONSE TO

REQUEST FOR INFORMATION DATED MARCH 12, 2012

INDIANA MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-315 AND 50-316

1.0 INTRODUCTION

By letter dated October 31, 2012 (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML12318A176), Indiana Michigan Power Company, (the licensee), for Donald C. Cook Nuclear Plant (CNP), Units 1 and 2, provided an assessment of its communications capabilities in response to the U.S. Nuclear Regulatory Commission's (NRC's) March 12, 2012 (ADAMS Accession No. ML12053A340), request for information, regarding the Near-Term Task Force (NTTF), Recommendation 9.3, on emergency preparedness communications, under Section 50.54(f) to Title 10 to the *Code of Federal Regulations* (10 CFR).

Within the licensee response letter, an assessment of the current communications systems and equipment to be used during an emergency event was performed to identify any enhancements needed to ensure communications are maintained during and following a beyond design basis large-scale natural event. In this assessment it was assumed that a large-scale natural event causes: (1) a loss of all alternating current (ac) power; and (2) extensive damage to normal and emergency communications systems both onsite and in the area surrounding the site (i.e., within 25 miles of the site, consistent with the guidance endorsed by NRC's May 15, 2012, letter (ADAMS Accession No. ML12131A043)). The licensee identified interim actions (ADAMS Accession No. ML12172A353) taken during the period of implementation of the planned improvements to the communications systems or procedures.

Background

On March 12, 2012, the NRC issued a letter entitled "Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident." In accordance with 10 CFR 50.54(f), addressees were requested to submit a written response to the information requests within 90 days.

Enclosure

The March 12, 2012, letter, states, if an addressee cannot meet the requested response date, then the addressee must respond within 60 days of the date of the letter, and describe the alternative course of action that it proposes to take, including any estimated completion date. In a letter dated May 11, 2012 (ADAMS Accession No. ML12142A110), the licensee committed to submit its completed communications assessment and implementation schedule by October 31, 2012. In a letter dated June 8, 2012 (ADAMS Accession No. ML12172A353), the licensee also provided its description of interim actions (discussed in further detail in Section 3.0) that have been taken, or are planned to be taken, to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete. The NRC staff found the licensee's proposed schedule acceptable by letter dated June 8, 2012 (ADAMS Accession No. ML12145A640).

Enclosure 5 of NRC's March 12, 2012, letter contained specific requested information associated with NRC's NTTF, Recommendation 9.3, for emergency preparedness communications. Specifically, the NRC requested that licensees provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large-scale natural event and subsequent loss of ac power. The licensee's assessment should:

- Identify any planned or potential improvements to existing onsite communications systems and their required normal and/or backup power supplies;
- Identify any planned or potential improvements to existing offsite communications systems and their required normal and/or backup power supplies;
- Provide a description of any new communications system(s) or technologies that will be deployed based upon a large-scale natural event and damage to communications systems onsite and offsite; and
- Provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all ac power.

The letter also asked for licensees to:

- Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete; and
- Provide a schedule of the time needed to implement the results of the communications assessment.

2.0 REGULATORY EVALUATION

The NRC staff reviewed the licensee's responses to the March 12, 2012, 10 CFR 50.54(f), request for information against the regulations and guidance described below.

2.1 Regulations

Section 50.47, "Emergency plans," to 10 CFR Part 50, sets forth emergency plan requirements for nuclear power plant facilities.

Section 50.47(b) establishes the standards that the onsite and offsite emergency response plans must meet for NRC staff to make a positive finding that there is reasonable assurance that the licensee can and will take adequate protective measures in the event of a radiological emergency. Planning Standard (6) of this section requires that a licensee's emergency response plan contain provisions for communications among response organizations to emergency personnel and the public. Planning Standard (8) requires that the design should include adequate emergency facilities and equipment to support emergency response.

Section IV.D of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR Part 50, requires that a licensee have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. The design objective of the alert and notification system shall be to have the capability to complete the alerting and initiate notification of the public within the plume exposure pathway within approximately 15 minutes. This alerting and notification capability will include a backup method of public alerting and notification.

Section IV.E of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR Part 50, states that adequate provisions will be made and described for emergency facilities including at least one onsite and one offsite communications system; and each system shall have a backup power source. These arrangements will include:

- a. Provision for communications with contiguous State/local governments within the plume exposure pathway emergency planning zone.
- b. Provision for communications with Federal emergency response organizations.
- c. Provision for communications among the nuclear power reactor control room, the onsite technical support center, and the emergency operations facility; and among the nuclear facility, the principal State and local emergency operations centers, and the field assessment teams.
- d. Provisions for communications by the licensee with NRC Headquarters and the appropriate NRC Regional Office Operations Center from the nuclear power reactor control room, the onsite technical support center, and the emergency operations facility.

2.2 Guidance

Nuclear Energy Institute (NEI) 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communication Capabilities," presents a methodology for licensees to analyze their ability to perform critical communications during and after a large-scale natural event. NRC staff has previously reviewed NEI 12-01 (ADAMS Accession No. ML12131A043)

and determined it to be an acceptable method for licensees to use in responding to the NRC's March 12, 2012, information request.

The NRC staff reviewed the licensee's analyses against the assumptions and guidance within NEI 12-01, Sections 2.2, 2.4, and 4. These sections provide a discussion on the assumptions and criteria to be used for a communications assessment.

3.0 TECHNICAL EVALUATION

In its October 31, 2012, letter, the licensee submitted its assessment of communications assuming a large-scale natural event, which would lead to an extended loss of all ac power. This letter included a discussion of required communications links, primary and backup methods of communications, and any identified improvements.

The NRC staff sent a letter dated January 23, 2013 (ADAMS Accession No. ML13016A111), to all operating reactor licensees, requesting that eight generic technical issues, derived from NEI 12-01, be analyzed for applicability to their Communication Assessments. By letter dated February 22, 2013 (ADAMS Accession No. ML13071A347), the licensee responded to these generic technical issues.

3.1 Communication Areas Reviewed

3.1.1 Communication Links

Donald C. Cook Nuclear Plant, Units 1 and 2, currently has communications capabilities with offsite response organizations, NRC, between licensee emergency response facilities, with field and offsite monitoring teams, and with in-plant and offsite licensee emergency response organization staff. As part of its communications assessment, the licensee has determined that certain existing communications systems equipment, such as public address system telephones, radio-to-radio communications, and sound-powered telephones would be available after implementation of planned enhancements, for some communication links listed above given a seismic, high wind, or flooding event. The licensee also determined that the field monitoring team radio communications would be available, and will be further enhanced with satellite telephones. The availability of these systems was determined by evaluating the equipment against seismic, flooding, and high wind events. The final location of the equipment will be consistent with criteria contained within NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide." NEI 12-01 discusses that this FLEX criteria is a reasonable definition of protectiveness.

As an interim measure prior to the implementation of all planned enhancements, the licensee purchased portable satellite telephones and batteries for the site. These portable satellite telephones have been purchased and are currently in-place for offsite response organization communications within licensee emergency response facilities. Existing radio-to-radio communications and sound-powered telephones are available to allow for onsite communications. Portable generators, radio batteries and battery chargers, have been purchased for the site, as well as to help power satellite telephone and radio batteries.

Licensee staff has been provided training on these satellite telephones and have performed a drill demonstrating the strategies for powering communications equipment for a 24-hour duration.

As the planned enhancement, the licensee is purchasing additional supplies of portable satellite telephones and enhancing communication systems for the links outlined in Section 4 of NEI 12-01. The satellite telephones will be utilized as one of the key methods for maintaining each offsite communication link, in conjunction with radios. Communications onsite will utilize combinations of the satellite telephones, public address system telephones, sound-powered telephones, and radio communications. The radio-to-radio communications will be augmented by existing sound-powered telephones and the public address system telephones. The capability of the satellite telephones will be enhanced by the purchase of additional portable satellite telephones, batteries and battery chargers. The radios will be enhanced by assuring reasonable survivability of the offsite radio repeaters and antennas; mapping of radio reception within the emergency planning zone; and providing backup power for charging handheld radios. The public address system will be enhanced with the ability to be powered via generator. The licensee also confirmed that communications with offsite response organizations can be maintained with portable satellite phones at these affected offsite locations. The licensee will further evaluate and put these enhancements in place in alignment with FLEX.

The NRC staff has reviewed the licensee's expected communications links within their communications assessment. In reviewing the submittal, the NRC staff considered whether it is reasonable that each communication link can be maintained, after the implementation of all planned enhancements, in accordance with the NRC-endorsed guidance of NEI 12-01. The satellite telephones are expected to help maintain communications offsite and between emergency response facilities by their ability to function without infrastructure postulated to be damaged by a large-scale natural event. The site radios will help ensure communications offsite and in areas of the plant due to its ability for these radios to communicate without repeaters. The sound-powered telephones and public address system will provide communications capabilities in conjunction with radio-to-radio communications in needed areas of the plant. The site radio system will be able to communicate more fully offsite by assuring the survivability of a repeater and antenna. The NRC staff concludes that since the licensee's assessment for the availability of communications systems is reasonable, and planned enhancements are to be made for communications areas to help ensure reliability, the licensee's interim measures and proposed enhancements will help to ensure that communications are maintained consistent with the assumptions in NRC-endorsed guidance of NEI 12-01.

3.1.2 Equipment Location

The CNP licensee analyzed the survivability of existing equipment for large-scale natural events by crediting equipment analyzed to also be available against seismic, wind, and flooding. Enhancements to equipment protection will be made by storing portable equipment in accordance with the FLEX criteria. These criteria were also used to determine ancillary equipment storage locations, including the generators that will be used to support the interim measures and/or planned enhancements. The determination of final storage locations of

communications equipment will be completed in alignment with the FLEX criteria (current equipment storage locations include emergency response facilities).

The NRC staff reviewed the licensee's submittal and verified that the licensee has considered the equipment location and protection contained within the NRC-endorsed guidance of NEI 12-01. The NRC staff also verified that all equipment discussed in Section 3.1.1 of this document has been analyzed and found to be available after a large-scale natural event, or would be stored in a reasonably protected area from seismic, flooding, and high wind events as discussed in NEI 12-01. The NRC staff also ensured that ancillary equipment, such as generators would also be protected from seismic, flooding, and high wind events.

Based on this review, the NRC staff considers the licensee's analysis of communications assessment equipment survivability and proposed enhancements for equipment location to be consistent with the NRC-endorsed guidance NEI 12-01. This determination of equipment protection supports the conclusion that these measures will help to ensure communications equipment availability for a large-scale natural event.

3.1.3 Equipment Power and Fuel

The CNP licensee analyzed the availability of its communications system power supplies following the loss of all ac power. The licensee proposed a combination of batteries and generators to power site communications equipment, including the satellite telephones and radios, and has procured extra batteries for this equipment. The site strategies will result in: (1) radios having an adequate battery supply for operations for 24 hours and, if necessary, to allow for generator charging of spare batteries; (2) each satellite telephone having an adequate battery supply to allow for operations and charging; (3) the ability to power the radio system and public address system with generators; and (4) sufficient fuel for the generators. It is expected that this equipment has power to support communications for a minimum of 24 hours, based on assumptions for impeded site access. Alternate power supplies (such as an uninterruptible power supply) will also be provided for the outage support center, technical support center, and emergency operations facility. The licensee is planning to have these enhancements to the communication system power supplies further evaluated and completed in alignment with the FLEX strategies.

The NRC staff has reviewed the licensee's communications assessment power supplies. In reviewing the submittal, the NRC staff finds it reasonable to assume that power for the existing equipment and proposed enhancement equipment, as listed in Section 3.1.1 of this document, would remain available for a 24-hour duration, based on the availability of extra batteries and the expected availability of generator fuel. Additionally, the licensee's proposed enhancement is in accordance with NRC-endorsed guidance of NEI 12-01.

Based on this review, the NRC staff considers the licensee's analysis of equipment power and proposed enhancements for equipment power to be consistent with NRC-endorsed guidance NEI 12-01. This determination of available equipment power, supports the conclusion that these measures will help to ensure communications equipment functionality for a large-scale natural event.

3.1.4 Proceduralization and Training

The CNP licensee confirmed that existing procedures will be modified to describe the shared use of equipment for different communication functions. The licensee also plans to implement programmatic control strategies for communications equipment. Maintenance and operability testing for the satellite telephones are currently in place. Operating procedures for the portable generators are in place, and new procedures will be developed for their maintenance and operability testing. Periodic checks for all equipment will be completed in alignment with FLEX and vendor information. Equipment will not be placed in service until licensee staff demonstrates the ability to test, maintain, and operate the equipment. Licensee staff will receive periodic training on this communications equipment location and use by March 2015. In the interim, user aids and equipment familiarization training has been provided to licensee staff.

The existing public address system (with battery backup) allows for the notification of plant employees after a large-scale natural event. The licensee has procedures in place for emergency response organization staff self-activation due to major disturbances in the power grid. These site procedures will activate the offsite emergency response organization and notify plant staff.

The NRC staff reviewed the licensee's commitments on the planned quality assurance and maintenance of the equipment and licensee staff training on the use of this equipment. The NRC staff determined that the licensee's submittal is in accordance with the NRC-endorsed guidance of NEI 12-01.

Based on this review, the NRC staff considers the licensee's planned proceduralization of equipment use and licensee staff training to be consistent with NRC-endorsed guidance, NEI 12-01. This determination of equipment availability and functionality supports the conclusion that these measures will help to ensure communications equipment functionality for a large-scale natural event.

4.0 CONCLUSION

The NRC staff has reviewed the licensee's communications assessment for communications with, or among, the following: offsite response organizations, NRC, licensee emergency response facilities, field and offsite monitoring teams, and onsite and in-plant response teams. In reviewing the submittal, the NRC staff considered the factors outlined above and determined that the licensee's assessment of existing equipment, proposed enhancements, and interim actions was in accordance with the NRC-endorsed guidance of NEI 12-01.

The NRC staff concludes that the licensee's assessment for communications is reasonable, and that the licensee's existing systems, proposed enhancements, and interim measures will help to ensure that communications are maintained. Furthermore, in coordination with the NTTF, Recommendation 4.2 (Mitigation Strategies), the NRC staff is planning to follow up with the licensee to confirm that upgrades to the site's communications systems have been completed.

L. Weber

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If you have any questions, please contact me at (301) 415-4037 or by e-mail at Thomas.Wengert@nrc.gov.

Sincerely,

/RA/

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