



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

September 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 – REQUEST FOR
ADDITIONAL INFORMATION ON THE APPLICATION FOR AMENDMENT TO
TRANSITION THE FIRE PROTECTION PROGRAM TO NATIONAL FIRE
PROTECTION ASSOCIATION STANDARD 805 (TAC NOS. ME6629 AND
ME6630)

Dear Mr. Weber:

By letter dated July 1, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11188A145), as supplemented by letters dated September 2, 2011, April 27, 2012, June 29, 2012, August 9, 2012, October 15, 2012, November 9, 2012, January 14, 2013, February 1, 2013, May 1, 2013, and June 21, 2013, Indiana Michigan Power Company (I&M) submitted an application for a license amendment to transition the Donald C. Cook Nuclear Plant, Units 1 and 2, fire protection program, from Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.48(b), to 10 CFR 50.48(c), National Fire Protection Association Standard (NFPA) 805. Some portions of the supplemental information contain security related information and are therefore withheld from public disclosure.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the subject submittals and determined that additional information is needed to complete the review, as described in the enclosed request for additional information (RAI). The NRC staff had discussed the RAI in draft form with your staff on July 18, 2013. During that discussion, the NRC staff agreed to revise certain draft questions. On September 5, 2013, Ms. Helen Etheridge of your staff agreed to submit your response by September 16, 2013.

L. Weber

- 2 -

Please feel free to contact me at (301) 415-4037 if you need any further clarification of the questions in the enclosure.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Wengert". The signature is fluid and cursive, with the first name "Thomas" and last name "Wengert" clearly distinguishable.

Thomas J. Wengert, 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: Distribution via ListServ

REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST TO ADOPT
NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805
DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2
DOCKET NOS. 50-315 AND 50-316

By letter dated July 1, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11188A145), as supplemented, Indiana Michigan Power Company (I&M, the licensee) submitted an application for license amendment to transition the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2, fire protection program, from Title 10 of the *Code of Federal Regulations* (CFR), Section 50.48(b), to 10 CFR 50.48(c), National Fire Protection Association Standard (NFPA) 805. The Nuclear Regulatory Commission (NRC) staff has reviewed the subject submittals and determined that additional information is needed to complete its review, as described in the following Request for Additional Information (RAI).

Background

By letter dated May 1, 2013 (ADAMS Accession No. ML13123A298) I&M provided a response to RAI-61, which requested a change in risk evaluation using alternative key assumptions. Based, in part, on the results of this evaluation, the licensee proposes to install new reactor coolant pump (RCP) seals that, when actuated, are expected to restrict reactor coolant system inventory losses to very small leakage rates during plant events that arise from the loss of all RCP seal cooling. Installation of these new seals is expected to reduce risk from seal leakage and this reduction in risk caused the total change in risk from transitioning to NFPA 805 using alternative assumptions to decrease to a value below the acceptance guidelines in Regulatory Guide (RG) 1.174. The likelihood and magnitude of inventory loss from these types of RCP seals assumed by CNP was based on Revision 1 to Pressurized Water Reactor Owners Group Topical Report WCAP-17100-P/NP, "PRA Model for the Westinghouse Shutdown Seal." Recently, I&M notified the NRC about recent operating experience with the new RCP seals, which indicates that the likelihood and magnitude of inventory loss may be greater than that assumed by CNP from these types of seals.

RAI-63 Probabilistic Risk Assessment

1. What impact does this recent operating experience with the new RCP seals have on the reduction in risk referred to above? Provide the revised risk estimates of the impacts, including the basis for any revised assumptions.
2. If the impact causes the total change in risk from transitioning to NFPA 805 using alternative assumptions to exceed the acceptance guidelines of RG 1.174, how does CNP plan to address this operating experience?
3. Discuss whether any currently proposed license conditions are affected by these changes.

Enclosure

L. Weber

- 2 -

Please feel free to contact me at (301) 415-4037 if you need any further clarification of the questions in the enclosure.

Sincerely,

/RA/

Thomas J. Wengert, 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: Distribution via ListServ

DISTRIBUTION:

PUBLIC	LPL3-1 r/f	
RidsNrrPMDCCook Resource	RidsNrrLASRohrer Resource	
RidsAcrcsAcnw_MailCTR Resource	RidsNrrDraAfpb Resource	RidsNrrDorIDpr Resource
RidsRgn3MailCenter Resource	RidsNrrDraApla Resource	MSnodderly, NRR
HHamzehee, NRR	AKlein, NRR	RidsNrrDorlLpl3-1 Resource
SDinsmore, NRR	HBarrett, NRR	JRobinson, NRR

ADAMS Accession No.: ML13210A204

OFFICE	LPL3-1/PM	LPL3-2/LA	DRA/APLA/BC	LPL3-1/BC	LPL3-1/PM
NAME	TWengert	SRohrer	HHamzehee	RCarlson	TWengert
DATE	09/06/13	07/31/13	08/06/13	09/06/13	09/06/13

OFFICIAL RECORD COPY