

NRR-PMDAPEm Resource

From: Wengert, Thomas
Sent: Thursday, July 11, 2013 1:42 PM
To: hletheridge@aep.com
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Subject: DC Cook - Draft RAI Concerning Revision to Regulatory Commitments Associated with Application for Renewed Operating Licenses (TAC Nos. MF1308 and MF1309)
Attachments: DC Cook - Draft RAI Concerning LR Commitment Change 7-11-13.pdf

Helen,

Attached is a draft Request for Additional Information (RAI) concerning AEP's March 1, 2013, letter (ADAMS Accession No. ML13073A110) concerning a revision to Regulatory Commitments associated with application for Renewed Operating Licenses. Please review this draft RAI and let me know if you would like to have a conference call with the NRC staff to clarify this request.

Also, let's discuss the timing of your response.

Regards,

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DRAFT
REQUEST FOR ADDITIONAL INFORMATION
REVISION TO REGULATORY COMMITMENTS ASSOCIATED WITH APPLICATION FOR
RENEWED OPERATING LICENSES
DONALD C. COOK NUCLEAR PLANT (CNP), UNITS 1 AND 2
DOCKET NOS. 50-315 AND 50-316

By letter AEP-NRC-2013-15, dated March 1, 2013 (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML13073A110), Indiana Michigan Power Company (I&M) submitted a notification of a change to a portion of Commitment No. 23 of Appendix A of NUREG-1831 (ADAMS Accession No. ML051510092), "Safety Evaluation Report Related to the License Renewal of the Donald C. Cook Nuclear Plant, Units 1 and 2." Commitment No. 23 states, in part, that the licensee will enhance the Structures Monitoring Program to include the security diesel generator room prior to October 25, 2014, for Unit 1 and December 23, 2017, for Unit 2. In its March 1, 2013 letter, the licensee stated that it is changing this commitment to remove the security diesel generator room from inclusion to the Structures Monitoring aging management program (AMP) because the security diesel generator does not meet the scoping requirements specified in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 54.4 since the security diesel generator does not perform a safety function and the security diesel is not credited for outside lighting for either the 10 CFR Appendix R or National Fire Protection Association Standard 805 (NFPA 805) Fire Protection Programs. The Nuclear Regulatory Commission (NRC) staff has determined that additional information is needed to complete the review.

Table 2.4.4-1 of the CNP license renewal application (LRA) listed the security diesel generator room as a yard structure with a license renewal function of shelter and support for the security diesel generator, which provides lighting required for 10 CFR 50.48, in accordance with the scoping criteria in 10 CFR 54.4(a)(3). LRA Section 2.3.3.6 also states that the function of the security diesel is to provide power for emergency lighting for access to nitrogen regulator valves and that the security diesel is required to support the Appendix R safe shutdown analysis. However, I&M letter AEP-NRC-2013-15 indicates that the security diesel generator is not credited in the Appendix R or NFPA 805 fire protection programs. The NRC staff is requesting clarification on the contradictory information about the function of the security diesel generator and the equipment used in the Appendix R safe shutdown analysis, with respect to the scope of license renewal aging management consideration.

- RAI-01: Indicate specifically what equipment, relative to the function stated above, is credited in the Appendix R safe shutdown analysis.
- RAI-02: If equipment other than the security diesel is used to perform the stated function, state whether the equipment and supporting or sheltering structures or components are in scope of the Structures Monitoring AMP. If those structures or components are not in the Structures Monitoring AMP, provide technical basis for excluding them from the program.