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Indiana Michigan Power Cook Nuclear Plant One Cook Place Bridgman, MI 49106 IndianaMichiganPower.com

October 9, 2013

AEP-NRC-2013-86 10 CFR 50.90

Docket No.: 50-315

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC, 20555-0001

#### Donald C. Cook Nuclear Plant Unit 1

Supplement to the Response to Request for Additional Information Regarding the Emergency License Amendment Request Regarding Containment Distributed Ignition System

References:

- Letter from J. P. Gebbie, Indiana Michigan Power Company (I&M), to U. S. Nuclear Regulatory Commission (NRC) Document Control Desk, "Donald C. Cook Nuclear Plant Unit 1 Emergency License Amendment Request Regarding Containment Distributed Ignition System," dated October 7, 2013.
- 2. Electronic mail from T. J. Wengert, NRC, to H. L. Etheridge, I&M, "DC Cook Emergency LAR Draft RAI Revision 1," dated October 8, 2013.
- 3. Letter from J. P. Gebbie, I&M, to NRC Document Control Desk, "Response to Request for Additional Information Regarding the Emergency License Amendment Request Regarding Containment Distributed Ignition System," dated October 8, 2013.

By Reference 1, Indiana Michigan Power Company (I&M), licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1, proposed to amend CNP Unit 1 Facility Operating License DPR-58 to modify Technical Specification (TS) 3.6.9, "Distributed Ignition System (DIS)." By Reference 2, the Nuclear Regulatory Commission (NRC) transmitted a Request for Additional Information regarding the Emergency License Amendment Request submitted by I&M in Reference 1. By Reference 3, I&M provided a response to Reference 2. This letter is a supplement by I&M to the response provided in Reference 3.

Subsequent to the response provided in Reference 3, I&M determined that the Footnotes in the marked up TS pages provided in Reference 3 did not concisely reflect the expiration conditions that were discussed in the response provided in Reference 3. Revised marked up TS pages are provided in Enclosure 2 to this letter that reflect concise expiration conditions of the Footnotes with new text on these pages marked with a single-line border.

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# U. S. Nuclear Regulatory Commission Page 2

Enclosure 1 to this letter provides an affirmation statement pertaining to the information contained herein. Enclosure 2 to this letter provides revised Unit 1 TS pages marked to show the proposed changes. New clean Unit 1 TS pages with proposed changes incorporated will be provided to the NRC Licensing Project Manager when requested. Associated TS Bases changes will be made in accordance with the CNP Bases Control Program.

Copies of this letter and its enclosures are being transmitted to the Michigan Public Service Commission and Michigan Department of Environmental Quality, in accordance with the requirements of 10 CFR 50.91.

There are no new regulatory commitments made in this letter. Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,

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Joel P. Gebbie Site Vice President

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Enclosures:

- 1. Affirmation
- 2. Revised Donald C. Cook Nuclear Plant Unit 1 Technical Specification Pages Marked To Show Proposed Changes
- c: J. T. King MPSC S. M. Krawec, AEP Ft. Wayne, w/o enclosures MDEQ - RMD/RPS NRC Resident Inspector C. D. Pederson - NRC Region III T. J. Wengert - NRC Washington DC

#### Enclosure 1 to AEP-NRC-2013-86

#### **AFFIRMATION**

I, Joel P. Gebbie, being duly sworn, state that I am Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company

N.MMr

Joel P. Gebbie Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS \_\_\_\_ DAY OF \_\_\_\_\_ 2013

Notary Public

My Commission Expires <u>OU-0U-0018</u>

DANIELLE BURGOYNE Notary Public, State of Michigan County of Berrien My Commission Expires 04-04-2018 Acting In the County of Acting in the

### Enclosure 2 to AEP-NRC-2013-86

# REVISED DONALD C. COOK NUCLEAR PLANT UNIT 1 TECHNICAL SPECIFICATION PAGES MARKED TO SHOW PROPOSED CHANGES 3.6.9-1 3.6.9-2

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# 3.6 CONTAINMENT SYSTEMS

3.6.9 Distributed Ignition System (DIS)

LCO 3.6.9 Two DIS trains shall be OPERABLE. (See footnote 1)

<u>AND</u>

Each containment region shall have at least one OPERABLE hydrogen ignitor. [See footnote 2]

APPLICABILITY: MODES 1 and 2.

### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One DIS train inoperable. (See footnote 1)	<ul><li>A.1 Restore DIS train to OPERABLE status.</li></ul>	7 days
	A.2 Perform SR 3.6.9.1 on the OPERABLE train.	Once per 7 days
<ul> <li>B. One containment region with no OPERABLE hydrogen ignitor. (See footnote 2)</li> </ul>	B.1 Restore one hydrogen ignitor in the affected containment region to OPERABLE status.	7 days
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	6 hours

Footnote 1: For the remainder of Fuel Cycle 25, or until the next entry into MODE 3, DIS Train B may be considered OPERABLE with two lower containment Phase 3 Power Supply ignitors inoperable.

Footnote 2: For the remainder of Fuel Cycle 25, or until the next entry into MODE 3, one of the following regions is allowed to have no OPERABLE ignitor: Region 12, 13, 14, 15, or 16.

## SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.9.1	Energize each DIS train power supply breaker and verify $\ge 34$ ignitors or $\ge 33$ ignitors if allowed by footnote 1 are energized in each train.	184 days (See footnote 3)
SR 3.6.9.2	Verify at least one hydrogen ignitor is OPERABLE in each containment region. (See footnote 2)	184 days (See footnote 3)
SR 3.6.9.3	Energize each hydrogen ignitor and verify temperature is ≥ 1700°F. (See footnote 1)	24 months

Footnote 1: For the remainder of Fuel Cycle 25, or until the next entry into MODE 3, DIS Train B may be considered OPERABLE with two lower containment Phase 3 Power Supply ignitors inoperable.

Footnote 2: For the remainder of Fuel Cycle 25, or until the next entry into MODE 3, one of the following regions is allowed to have no OPERABLE ignitor: Region 12, 13, 14, 15 or 16.

Footnote 3: For the remainder of Fuel Cycle 25, or until the next entry into MODE 3, DIS Train A and Train B will be tested on a staggered basis, such that one Train is tested every 92 days starting with the first staggered test to be performed 92 days after the surveillance performed on October 4, 2013.

Cook Nuclear Plant Unit 1