Wengert, Thomas

From: Wengert, Thomas
Sent: Tuesday, October 08, 2013 5:59 PM
To: hletheridge@aep.com
Cc: 'mkscarpello@aep.com' (mkscarpello@aep.com)
Subject: DC Cook Emergency LAR Draft RAI Revision 1
Attachments: D.C. Cook Draft RAI Rev 1 10-8-13.pdf

Helen,

As clarified during this afternoon's conference call, I have revised the typographical error in RAI 4. Please see attached Revision 1 of the RAI set for the subject LAR.

Call me if you have any questions.

Regards,

Tom Wengert
Project Manager
NRR/DORL/LPL3-1
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D.C. Cook Emergency License Amendment Request
Request for Additional Information – Revision 1

Containment and Ventilation Systems Branch (SCVB)

1. Section 3.3 states that a modification is to be installed during the next refueling outage in Fall 2014. When was this modification initiated? When was it initially scheduled for installation? Was it ever deferred from a previous outage?

2. Section 3.2 second paragraph states "Radiation and high temperature hazards precluded access that would allow visual observation or repair of all Train A and Train B lower igniters in strings powered by Phase 3, except for Train A Phase 3 igniter A35." Citing this exception for igniter A35, could it be energized and a containment entry made to observe it for the "glow" and perhaps determine if it is the inoperable A train phase 3 igniter which would verify that Regions 12, 13, 14, 15 & 16 have at least one operable igniter thus determining if Condition B is actually met?

Tech Spec Branch

The LAR states: "The proposed TS change, which would allow Unit 1 to remain in Mode 1 until the affected ignitors can be replaced during an outage that occurs for other reasons, is preferable to the transient that would be incurred if the unit were forced to shut down."

3. Explain what TS Mode is required to perform the repair/replacement of the affected ignitors without exposing personnel to significant radiation and safety hazards.

4. If the plant is Mode 3 for any reason before the end of fuel cycle 25, explain why the plant cannot be placed in the Mode identified in your response to RAI #3 to facilitate replacement of the failed ignitors prior to returning to power operation.

10 CFR 50.36(c)(3) States: "*Surveillance requirements*. Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

5. The proposed Technical Specification changes would allow a relaxation of the performance TS 3.6.9, Condition A, Required Action A.2 Completion Time from performance of SR 3.6.9.1 from once per 7-days to the SR Frequency of 184 days. Given the stated suspected ignitor failure mechanism (operation at excessive voltage) and the method of discovery (TS Surveillance testing), explain how the relaxation of testing of the Operable DIS Train provides assurance that the LCO is met.

DORL

6. Footnote 2 on proposed TS page 3.6.9-2 appears to be incomplete (Regions 15 and 16 are not addressed). Confirm.