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January 29, 2014

AEP-NRC-2014-07
10 CFR 50.54(f)

Docket Nos.: 50-315
50-316

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

Donald C. Cook Nuclear Plant Units 1 & 2
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH NEAR-TERM
TASK FORCE RECOMMENDATION 2.3, FLOODING WALKDOWNS

- References:
1. R. J. Pascarelli, U. S. Nuclear Regulatory Commission (NRC), to L. J. Weber, Indiana Michigan Power Company (I&M); "Request for Additional Information Associated With Near-Term Task Force Recommendation 2.3, Flooding Walkdowns;" dated December 23, 2013 (ML13325A891).
 2. Letter from J. P. Gebbie, I&M, to NRC Document Control Desk; "180-Day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendations 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident;" dated November 26, 2012 (ML12340A442).

Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, is submitting the response to "Request For Additional Information [RAI] Associated With Near-Term Task Force Recommendation 2.3, Flooding Walkdowns" (Reference 1). The RAI is based on the I&M letter, "180-Day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendations 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" (Reference 2).

Enclosure 2 provides the I&M RAI response for CNP Units 1 and 2.

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

Sincerely,

Joel P. Gebbie
Site Vice President

JJV/amp

ADD
NRR

Enclosures:

1. Affirmation
2. Response to "Request for Additional Information Associated With Near-Term Task Force Recommendation 2.3, Flooding Walkdowns;" dated December 23, 2013

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-2014-07

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.

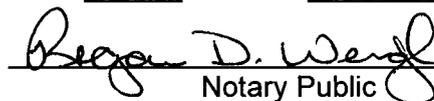
Indiana Michigan Power Company



Joel P. Gebbie
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 29th DAY OF January, 2014



Notary Public

My Commission Expires 1/21/2018

Enclosure 2 TO AEP-NRC-2014-07

Donald C. Cook Nuclear Plant Units 1 and 2
Response to "Request for Additional Information Associated With Near-Term Task Force
Recommendation 2.3, Flooding Walkdowns;" dated December 23, 2013

Please provide the following:

1. *Confirmation that the process for evaluating APM was reviewed;*

Request for Additional Information (RAI) 1 Response:

Indiana Michigan Power has reviewed the process for evaluating available physical margin (APM). Donald C. Cook Nuclear Plant Flooding Walkdown Reports (MD-12-FLOOD-001-S and MD-12-FLOOD-002-S) contain the information described in this RAI regarding the evaluation, determination, and documentation of APM.

2. *Confirmation that the APM process is now or was always consistent with the guidance in NEI 12-07 and discussed in this RAI;*

RAI 2 Response:

A flooding walkdown feature list was developed for the performance of the walkdown process. Pre-established small-margin threshold values for the flooding protection features were not defined and/or documented in the Flooding Walkdown Reports. The APM for a portion of the flooding protection features were numerically determined by measurement similar to Approach A. For the flooding protection features where the APM was not numerically determined, the basis of the "not small" determination does not contain the level of detail described in Approach B. Flooding protection features that were judged to have a small APM were entered into the corrective action program (CAP) for evaluation.

The APM process was not consistent with the detailed steps described within the RAI. Although the intent of the flooding walkdown process was met, the level of detail in the walkdown reports does not support an independent verification of the expected implementation of the process as described in the RAI. Additional evaluation and documentation of APM determinations will be performed as described in RAI 4 Response below.

3. *If changes are necessary, a general description of any process changes to establish this consistency;*

RAI 3 Response:

Additional evaluation and documentation of APM determinations will be performed as described in RAI 4 Response below.

4. *As a result of the audits and subsequent interactions with industry during public meetings, NRC staff recognized that evaluation of APM for seals (e.g., flood doors, penetrations, flood gates, etc.) was challenging for some licensees. Generally, licensees were expected to use either Approach A or Approach B (described below) to determine the APM for seals:*
- a) *If seal pressure ratings were known, the seal ratings were used to determine APM (similar to example 2 in Section 3.13 of NEI 12-07). A numerical value for APM was documented. No further action was performed if the APM value was greater than the pre-established small-margin threshold value. If the APM value was small, an assessment of "significant consequences" was performed and the guidance in NEI 12-07 Section 5.8 was followed.*
 - b) *If the seal pressure rating was not known, the APM for seals in a flood barrier is assumed to be greater than the pre-established small-margin threshold value if the following conditions were met: (1) the APM for the barrier in which the seal is located is greater than the small-margin threshold value and there is evidence that the seals were designed/procured, installed, and controlled as flooding seals in accordance with the flooding licensing basis. Note that in order to determine that the seal has been controlled as a flooding seal, it was only necessary to determine that the seal configuration has been governed by the plant's design control process since installation. In this case, the APM for the seal could have been documented as "not small".*

As part of the RAI response, state if either Approach A or Approach B was used as part of the initial walkdowns or as part of actions taken in response to this RAI. No additional actions are necessary if either Approach A or B was used.

If neither Approach A or B was used to determine the APM values for seals (either as part of the walkdowns or as part of actions taken in response to this RAI), then perform the following two actions:

- *Enter the condition into the CAP (note: it is acceptable to utilize a single CAP entry to capture this issue for multiple seals). CAP disposition of "undetermined" APM values for seals should consider the guidance provided in NEI 12-07, Section 5.8. The CAP disposition should confirm all seals can perform their intended safety function against floods up to the current licensing basis flood height. Disposition may occur as part of the Integrated Assessment. If an Integrated Assessment is not performed, determine whether there are significant consequences associated with exceeding the capacity of the seals and take interim action(s), if necessary, via the CAP processes. These actions do not need to be complete prior to the RAI response.*
- *Report the APM as "undetermined" and provide the CAP reference in the RAI response.*

RAI 4 Response:

Neither Approach A nor Approach B as described in the RAI was fully implemented during the flooding walkdowns to determine APM for all flood protection features, including seals. Portions of Approach A and Approach B were implemented for individual flood protection features during the flooding walkdown process. Additional actions to implement Approach A or Approach B were not performed during the preparation of this RAI response.

CAP Action Request 2014-0120 has been generated to disposition and document the "undetermined" APM values using the clarifications provided in the RAI and direct documentation of the results in the Flood Hazard Reevaluation Integrated Assessment.