

## NRR-PMDAPEm Resource

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**From:** Dietrich, Allison  
**Sent:** Thursday, December 10, 2015 11:40 AM  
**To:** hlkish@aep.com  
**Cc:** Terry L Curtiss (tlcurtiss@aep.com); Casto, Greg; Purciarello, Gerard; Chernoff, Margaret; Pelton, David  
**Subject:** D.C. COOK NUCLEAR PLANT, UNIT 2 - SBPB REQUEST FOR ADDITIONAL INFORMATION CONCERNING ESFAS LAR (CAC NO. MF6984)  
**Attachments:** SBPB RAI regarding U2 ESFAS LAR MF6984.pdf

By letter dated October 19, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15293A497), Indiana Michigan Power Company (I&M) submitted a license amendment request for the Donald C. Cook Nuclear Plant, Unit 2. The proposed amendment would modify technical specifications (TSs) requirements for the Engineered Safety Feature Actuation System Instrumentation by adding a new Condition for inoperable required channels for main feedwater pump trips, and by adding a footnote to the Applicable Mode column of TS Table 3.3.2-1 to reflect the new Condition.

The U.S. Nuclear Regulatory Commission staff in the Balance of Plant Branch of the Office of Nuclear Reactor Regulation is currently reviewing your submittal. The staff has determined that additional information is needed in order to complete the review, as described in the attached request for additional information (RAI). The draft RAI was sent to I&M via electronic mail on November 30, 2015. A clarification telephone conference was held on December 10, 2015. Based on our discussion, we understand that a response will be provided by January 22, 2016.

Please let me know if you have any questions or concerns.

Sincerely,

Allison W. Dietrich, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
301-415-2846

**Hearing Identifier:** NRR\_PMDA  
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**Subject:** D.C. COOK NUCLEAR PLANT, UNIT 2 - SBPB REQUEST FOR ADDITIONAL INFORMATION CONCERNING ESFAS LAR (CAC NO. MF6984)  
**Sent Date:** 12/10/2015 11:39:38 AM  
**Received Date:** 12/10/2015 11:39:00 AM  
**From:** Dietrich, Allison

**Created By:** Allison.Dietrich@nrc.gov

**Recipients:**

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Tracking Status: None

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**Post Office:**

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MESSAGE	1394	12/10/2015 11:39:00 AM
SBPB RAI regarding U2 ESFAS LAR MF6984.pdf		88635

**Options**

**Priority:** Standard

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**Reply Requested:** No

**Sensitivity:** Normal

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**Recipients Received:**

REQUEST FOR ADDITIONAL INFORMATION REGARDING  
LICENSE AMENDMENT REQUEST  
TECHNICAL SPECIFICATION 3.3.2, ESFAS INSTRUMENTATION  
DONALD C. COOK NUCLEAR PLANT, UNIT 2  
DOCKET NO. 50-316  
CAC NO. MF6984

RAI-SBPB-1

Section 3.1 of the license amendment request (LAR) states that “loss of both anticipatory trip channels does not place the plant in an unanalyzed condition and, therefore, the plant should not be required to enter TS [technical specification] Limiting Condition of Operation (LCO) 3.0.3.” The LAR does not explain how starting one main feedwater pump causes a loss of both anticipatory trip channels, nor does it provide the definition of a channel.

- a) Clarify the above statement, since starting a main feedwater pump results in a loss of only one anticipatory trip channel.
- b) Explain the concern regarding being required to enter TS LCO 3.0.3.
- c) Define each Engineered Safety Feature Actuation System (ESFAS) Function 6.g channel by identifying associated contacts and relays. Explain whether proposed TS Bases should be clarified regarding the composition of each channel.

RAI-SBPB-2

The LAR states that starting a main feedwater pump makes the associated ESFAS Function 6.g channel inoperable until it is supplying feedwater to the steam generators. The LAR proposes adding new Condition H and Note H.1. Note H.1 allows one ESFAS Function 6.g channel on one main feedwater pump to be inoperable for 4 hours.

Proposed Note H.1 becomes pertinent after entering Condition H. The value and purpose of Note H.1 is questionable because the proposed Condition H already provides for the channel to be inoperable for up to 48 hours. The purpose of Condition H is also questionable because Condition B already allows one channel to be inoperable for 48 hours.

- a) Explain the intended purpose of the proposed TS changes.
- b) Explain how the proposed TS changes accomplish the intended purpose. Alternatively, revise the proposed TS changes.