

## **NRR-PMDAPEm Resource**

---

**From:** Dietrich, Allison  
**Sent:** Wednesday, January 11, 2017 3:16 PM  
**To:** hlkish@aep.com  
**Cc:** Terry L Curtiss (tlcurtiss@aep.com)  
**Subject:** DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 – ACCEPTANCE REVIEW OF LAR TO REVISE TS 3.9.3 (CAC NOS. MF8931 AND MF8932)  
**Attachments:** Supplemental Information Request D.C. Cook MF8931 MF8932.pdf

By letter dated December 14, 2016 (Agencywide Documents Access and Management System (ADAMS Accession No. ML16351A198), Indiana Michigan Power Company (I&M, the licensee), submitted a license amendment request (LAR) for the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2. The proposed amendments would revise the Limiting Condition for Operation (LCO) note in CNP Technical Specification (TS) 3.9.3, "Containment Penetrations."

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the TSs) must fully describe the changes requested, and follow as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the attachment to this e-mail is necessary to enable the NRC staff to make an independent assessment regarding the acceptability of the proposed LAR in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that I&M supplement the application to address the information requested in the attachment. This will enable the NRC staff to complete its detailed technical review.

Please contact me to arrange a teleconference with the NRC staff within the next 5 working days to discuss the attached request for supplemental information.

Sincerely,

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

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 3265

**Mail Envelope Properties** (Allison.Dietrich@nrc.gov20170111151600)

**Subject:** DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 – ACCEPTANCE  
REVIEW OF LAR TO REVISE TS 3.9.3 (CAC NOS. MF8931 AND MF8932)  
**Sent Date:** 1/11/2017 3:16:11 PM  
**Received Date:** 1/11/2017 3:16:00 PM  
**From:** Dietrich, Allison

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

**Recipients:**  
"Terry L Curtiss (tlcurtiss@aep.com)" <tlcurtiss@aep.com>  
Tracking Status: None  
"hkish@aep.com" <hkish@aep.com>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>	
MESSAGE	2408	1/11/2017 3:16:00 PM	
Supplemental Information Request D.C. Cook MF8931 MF8932.pdf			565641

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

REQUEST FOR SUPPLEMENTAL INFORMATION REGARDING  
LICENSE AMENDMENT REQUEST TO REVISE  
TECHNICAL SPECIFICATION 3.9.3, CONTAINMENT PENETRATIONS  
INDIANA MICHIGAN POWER COMPANY  
DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2  
DOCKET NOS. 50-315 AND 50-316  
CAC NOS. MF8931 AND MF8932

By letter dated December 14, 2016, (Agencywide Documents Access and Management System (ADAMS) Accession Number ML16351A198), Indiana Michigan Power Company (I&M, the licensee), submitted a license amendment request (LAR) to revise the Donald C. Cook Nuclear Plant (CNP) Unit Nos. 1 and 2, Technical Specifications (TSs). The proposed change would revise the Limiting Conditions for Operation (LCO) note in CNP TS 3.9.3, "Containment Penetrations."

CNP TS LCO 3.9.3 contains the following note:

Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere via the auxiliary building vent may be unisolated under administrative controls.

This note applies a restriction of allowing only those containment penetrations that flow through the auxiliary building vent to be unisolated during movement of irradiated fuel within containment. The licensee proposes to remove this restriction by deleting, "via the auxiliary building vent," from the note. This proposed change would then allow all containment penetrations to the outside atmosphere to be unisolated under administrative controls.

The LAR states:

Removal of that restriction is appropriate because the FHA [fuel handling accident] analysis contained in the license amendment request (LAR) to adopt full-scope alternative source term (AST) (Reference 4), which was recently approved by the U. S. Nuclear Regulatory Commission (NRC) (Reference 7), no longer assumes that activity released from containment goes through the auxiliary building vent. Therefore, I&M requests to remove the stipulation in the LCO Note that limits administrative controls only to those containment penetrations exiting to the outside atmosphere through the auxiliary building vent.

The NRC-approved AST for the FHA in containment does assume that the release is not filtered and is released directly to the environment over a two-hour period from a point on the external containment surface closest to the control room intakes. In addition, the NRC-approved AST analysis for the FHA in the auxiliary building assumes that the fuel handling area exhaust ventilation is in service. However, the current NRC-approved AST FHA analysis does not assume that the FHA in containment is released within a two-hour period into the auxiliary building, and it does not credit the non-safety related auxiliary building ventilation system.

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.36 requires that the TSs be derived from the analyses and evaluation included in the safety analysis report. The two analyzed accidents of FHA in containment and FHA in the auxiliary building do not support the proposed change to CNP TSs because they do not analyze a release into the auxiliary building without the auxiliary building general ventilation system in service, due to it being a non-safety related system.

- Provide an FHA analysis that meets the limits in 10 CFR 50.67, is consistent with Regulatory Guide 1.183, and assumes that the FHA in containment is released within a two hour period into the auxiliary building. Include in the analysis the amount of in-leakage into the control room from the auxiliary building that is due to operator ingress and egress.

DRAFT