

March 14, 2000

Mr. Robert P. Powers, Senior Vice President
Indiana Michigan Power Company
Nuclear Generation Group
500 Circle Drive
Buchanan, MI 49107

SUBJECT: DONALD C. COOK - SUMMARY OF MARCH 6, 2000, PUBLIC MEETING AND RESULTING REQUEST FOR ADDITIONAL INFORMATION REGARDING AN UNREVIEWED SAFETY QUESTION ASSOCIATED WITH MODIFICATIONS TO THE AUXILIARY FEEDWATER PUMP ROOMS (TAC NOS. MA8183 AND MA8184)

Dear Mr. Powers:

This letter summarizes the meeting held on March 6, 2000, between members of your staff and the NRC related to the unreviewed safety question concerning the modifications being made to the cooling systems for the auxiliary feedwater pump rooms. The meeting was held at NRC headquarters in Rockville, Maryland. This meeting was open for public observations. Enclosure 1 provides a list of meeting attendees.

The licensee presented information related to the modifications being made to each auxiliary feedwater (AFW) pump room. As part of the resolution of high energy line break issues the licensee has chosen to seal up the AFW pump rooms. As a result, a change in each AFW pump room cooling system is required. In the review of the design modifications in accordance with 10 CFR 50.59, the licensee discovered that the changing the AFW pump room cooling system resulted in an unreviewed safety question (USQ) requiring review and approval by the NRC. By letter dated February 18, 2000, the licensee submitted a license amendment requesting NRC review and approval of the USQ. During the meeting, the licensee presented detailed information of how the change complied with the current design and licensing basis and applicable rules and regulations as stated in the D. C. Cook Updated Final Safety Analysis Report (UFSAR). The licensee also presented the reason why the modifications resulted in a USQ and the justification of why the modifications and associated USQ were acceptable. In addition, the licensee presented an overall risk assessment associated with the USQ.

The meeting helped the NRC staff to have a better understanding of the modifications being made to the AFW pump rooms and the justification for the USQ. At the close of the meeting, the NRC staff indicated that additional information would be required to allow the NRC staff to be able to complete the evaluation of the USQ. Enclosure 2 contains the NRC staff's request for additional information (RAI).

Please provide your response to the RAI as soon as possible to allow the NRC staff adequate time to review the information and provide a safety evaluation by your requested March 27, 2000, approval date.

R. Powers

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and the enclosures will be available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, and accessible electronically through the ADAMS Public Electronic Reading Room link at the NRC Web site (<http://www.nrc.gov>).

If you have any questions regarding this matter, please contact me at 301-415-1345.

Sincerely,

/RA Claudia M. Craig for

John F. Stang, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosures: 1. Attendee List
2. RAI

cc w/encls: See next page

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ATTENDANCE LIST FOR MARCH 6, 2000, MEETING

<u>NAME</u>	<u>ORGANIZATION</u>
Michael Hoskins	AEP/Design Engineer
Robert Godley	AEP/Director Regulatory Affairs
Scot Greenlee	AEP/Director Design Engineering
Jim Hawley	AEP/PRA Engineer
Bob Stakenborghs	S&L/Project Manager
Mike Rencheck	AEP/Vice President Engineering
Ian Jung	NRC/NRR
Chris Jackson	NRC/NRR
John Stang	NRC/NRR
Singh Bajwa	NRC/NRR

REQUEST FOR ADDITIONAL INFORMATION

1. Provide details on how the modifications to the AFW pump rooms have been installed in accordance with the design and licensing basis and in compliance with applicable rules and regulations. The information should be provided in a short bullet format as agreed to in the meeting.
2. Provide justification showing that with an increase in the probability of a malfunction associated with the AFW pump room modifications, that the AFW system and any other systems affected by the modifications will continue to perform their intended function as described in the UFSAR.
3. Provide the following information associated with the risk assessment:

Provide a copy of the risk assessment performed to support the proposed modifications. Describe the general methodology used for the risk assessment. The description should also include how the shortcomings and limitations of this methodology, as compared to an updated state-of-the-art PRA model, do not significantly underestimate the risk impact.

Provide all significant assumptions and their justifications made in the risk assessment methodology. For example, the operability of the AFW pumps without room cooling is important, and so is the potential operator recovery of the AFW system upon loss of Essential Service Water (ESW) by opening the AFW pump room doors.

Provide a short description of the information on plant design features and operating experience, i.e., reliability, unavailability, and/or events, associated with the ESW system. How does the information compare to the loss of ESW frequency used in your analysis?

The operator action to recover AFW pump room cooling in the event of a loss of ESW is risk significant. Do the proposed design modifications include appropriate procedural changes and operator training for operators? Describe the loss of ESW Emergency Operating Procedure enhancement.

Explain the source of the risk increase by describing the dominant sequences affected by the proposed modifications. The change in risk should also include the contribution from the full spectrum of initiating events including external events, not just from the loss of ESW initiating event.

Additional discussion on the safety benefits of the modifications is important; in particular, the risk decrease from the elimination of the high energy line break scenario vulnerability should be discussed.

One way to evaluate the risk is to use the Regulatory Guide (RG) 1.174 criteria. Does the risk impact of the proposed change meet the intent of the acceptance criteria in RG 1.174 in terms of core damage frequency and large early release frequency?

ENCLOSURE 2