

**ADAMS Accession No.: ML092240007**

**From:** Beltz, Terry  
**Sent:** Tuesday, August 11, 2009 12:55 PM  
**To:** 'mkscarpello@aep.com'  
**Cc:** 'pgschoepf@aep.com'; 'jrwaters@aep.com'; 'jmpetro@aep.com'; Huang, Tai  
**Subject:** Donald C. Cook Nuclear Plant, Unit 2 (CNP-2) - Draft RAIs re: LBLOCA Amendment Request (ME1017)  
**Attachments:** DC Cook Unit 2 - LBLOCA LAR - Draft RAIs - Rev 1.doc

Dear Mr. Scarpello:

This e-mail is in reference to Indian Michigan Power Company's (I&M, the licensee) license amendment request dated March 19, 2009 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML090930453). The proposed amendment would adopt a new analysis of a large break loss-of-coolant accident (LBLOCA) for CNP-2. The new analysis is performed using the NRC-approved methodology set forth in Westinghouse Topical Report WCAP-16009-P-A, "Realistic Large-Break LOCA Evaluation Methodology Using the Automated Statistical Treatment of Uncertainty Method (ASTRUM)." I&M proposes to endorse this methodology by a revision to Technical Specification (TS) 5.6.5, "Core Operating Limits Report (COLR)."

I&M also requests NRC approval to revise TS 3.4.1, "RCS [Reactor Coolant System] Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits," to change the minimum RCS total flow rate from 366,400 to 354,000 gallons per minute (gpm). I&M states that the current value is a minimum measured flow value includes allowances for flow uncertainty, and that current practice is that the thermal design flow value, which does not include allowances for flow measurement uncertainty, be specified in TSs. The minimum measured flow is specified in the COLR. That value is currently 354,000 gpm and is also reflected in the new LBLOCA analyses.

Finally, I&M proposes to amend TS 3.5.2, "ECCS – Operating." Condition D allows the unit to be in Mode 1, 2, or 3 for an unlimited amount of time if a Safety Injection (SI) system cross-tie valve is closed, provided that thermal power is reduced to less than or equal to a specified value. The new LBLOCA analysis being proposed does not address a condition in which an SI cross-tie valve is closed. Therefore, the allowance provided by Condition D will be deleted, as well as reference to Condition D in TS 3.5.2, Conditions A and C.

The NRC staff in the Reactor Systems Branch has reviewed I&M's submittal and developed draft requests for additional information (RAI). The draft RAIs are provided as an attachment to this e-mail. You were provided draft RAIs associated with this LAR on July 15, 2009.

**Subsequently, one additional draft RAI has been developed and is provided as Question 6 in the attachment.**

As we've discussed, the NRC staff would still like to review the draft RAIs with you in a conference call or meeting. Among other things, the discussion will include how the NRC would formally issue these questions and how the licensee will respond to them.

**The sole purpose of this e-mail and its attachment is to prepare you and others for the proposed conference call or meeting. This e-mail and its attachment do not convey a formal NRC staff position, and do not formally request for additional information.**

Please don't hesitate to contact me if you have any questions or concerns.

Sincerely,  
Terry A. Beltz, Senior Project Manager  
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Mail Envelope Properties ()

Subject: Donald C. Cook Nuclear Plant, Unit 2 (CNP-2) - Draft RAIs re: LBLOCA  
Amendment Request (ME1017)  
Sent Date: 8/11/2009 12:37:22 PM  
Received Date: 8/11/2009 12:54:00 PM  
From: Beltz, Terry

Created By: Terry.Beltz@nrc.gov

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Files	Size	Date & Time
MESSAGE	77411	8/11/2009
DC Cook Unit 2 - LBLOCA LAR - Draft RAIs - Rev 1.doc	59110	

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