

## NRR-PMDA-ECapture Resource

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**From:** Beltz, Terry  
**Sent:** Tuesday, August 26, 2014 4:06 PM  
**To:** Helen L Etheridge  
**Cc:** Terry L Curtiss (tlcurtiss@aep.com); Joe Tanko (jmtanko@aep.com); 'mkscarpello@aep.com'; Danielle M Burgoyne (dmburgoyne@aep.com); Pelton, David; Chawla, Mahesh; Shaikh, Samina  
**Subject:** D. C. Cook Nuclear Plant, Units 1 and 2 - Draft Request for Additional Information re: Change to TS 5.5.14 by Adopting NEI 94-01, Revision 3-A (TAC Nos. MF3568 and MF3569)

Dear Ms. Etheridge:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated March 7, 2014, Indiana Michigan Power Company (the licensee) submitted a license amendment request proposing changes to Technical Specification 5.5.14, "Containment Leakage Rate Testing Program," for the Donald C. Cook Nuclear Plant, Units 1 and 2. Specifically, the proposed to revise TS 5.5.14 by adopting Nuclear Energy Institute (NEI) 94-01, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." If approved, the proposed amendment would allow the next Type A containment integrated leak rate testing (ILRT) to be performed within 15 years from the last ILRT, as opposed to the current 10-year interval, and would allow successive ILRTs to be performed at 15-year intervals. Additionally, the proposed amendment would revise the maximum interval for the performance of Type C local leakage rate tests to a 75-month interval.

The NRC staff in the Containment and Ventilation Branch (SCVB) of the Office of Nuclear Reactor Regulation is currently reviewing your submittal. The staff has determined that additional information is required to complete its review. A draft request for additional information (RAI) is provided below.

You may accept these draft RAIs as formal requests for additional information and respond to the questions by October 1, 2014. Alternatively, you may seek further clarification and discuss the content of the RAI with the NRC staff in a conference call, including any change to the proposed response date.

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

Sincerely,

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**DRAFT REQUEST FOR ADDITIONAL INFORMATION**  
**CONTAINMENT AND VENTILATION BRANCH**  
**OF THE OFFICE OF NUCLEAR REACTOR REGULATION**

**REGARDING A LICENSE AMENDMENT REQUEST FOR THE DONALD C. COOK NUCLEAR PLANT,  
UNITS 1 AND 2**

**TO REVISE TECHNICAL SPECIFICATION SECTION 5.5.14, "CONTAINMENT LEAKAGE RATE TESTING  
PROGRAM"**

**INDIANA MICHIGAN POWER COMPANY**

**DOCKET NOS. 50-315 AND 50-316**

**(TAC NOS. MF3568 AND MF3569)**

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the Indiana Michigan Power Company (the licensee) license amendment request (LAR) application dated March 7, 2014 (Agencywide Documents Access and Management System Accession No. ML14071A435), for the Donald C. Cook Nuclear Plant (CNP), Units 1 and 2. The LAR would revise CNP Technical Specifications Section 5.5.14 "Containment Leakage Rate Testing Program." Specifically, the proposed amendment would allow the next containment integrated leak rate testing (ILRT) to be performed within 15 years from the last ILRT, as opposed to the current 10-year interval, and would allow successive ILRTs to be performed at 15-year intervals. Additionally, the proposed amendment would revise the maximum interval for the performance of Type C local leakage rate tests to a 75-month interval.

The NRC staff in the Containment and Ventilation Branch (SCVB) of the Office of Nuclear Reactor Regulation has determined that the additional information requested below is needed to complete its review.

**RAI-SCVB-1**

10 CFR 50 Appendix J, Option B Implementation item #3 states that:

The regulatory guide or other implementation document used by a licensee or applicant for an operating license under this part or a combined license under part 52 of this chapter to develop a performance-based leakage-testing program must be included, by general reference, in the plant technical specifications.

In your March 7, 2014, application, Enclosures 4 and 5 (markup of the Technical Specifications include reference to NEI 94-01, Revision 3-A. However, conditions and limitations contained in NEI 94-01, Revision 2-A, were not incorporated in NEI 94-01, Revision 3-A.

Please explain the reasoning for omitting reference to the Conditions and Limitations in NEI 94-01, Revision 2-A, in "Insert A" of Enclosures 4 and 5.