

INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

IE HQ FILE COPY

November 12, 1982
AEP:NRC:0660E

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
ORDER IMPOSING CIVIL MONETARY PENALTIES

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. DeYoung:

We have received your letter of October 14, 1982, with its enclosed Order Imposing Civil Monetary Penalties.

We appreciate the consideration you have given to our Response of March 1, 1982, and your consequent determination to withdraw the proposed civil penalties for Items I.A through I.F set out in your Notice of Proposed Imposition of Civil Penalties, dated December 30, 1981.

For the reasons set out in our March 1, 1982, Response, we take issue with the fines proposed for Items I.G, I.H, I.I, II.A and II.B. Nevertheless, rather than proceed with any extended debate over past events, we are enclosing herewith a check in the amount of \$52,000.00 covering your imposed fines for the events.

While we are not requesting a hearing with respect to your imposed fine concerning Item I.I, we respectfully request you to reconsider your determination in this single matter.

While there may well have been an honest misunderstanding of the distinction we made in our January 31, 1977 letter between "administrative measures" and "administrative procedures", it remains our view that the submittal was not false.

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app.

The January 31, 1977 Response in question stated

(a) In reply to Section B.2 of BTP 9.5-1:

"Administrative measures have been established to control the storage of combustible materials and to prohibit their storage in the vicinity of safety related systems. These measures basically conform to the guidance provided in Regulatory Guide 1.39." (emphasis supplied.)

(b) In reply to Section B.3(c) of BTP 9.5-1:

"Administrative procedures will be established to control the use of combustible materials within any safety related areas. These materials must be used immediately when brought into a safety related area and their use will be limited and controlled." (emphasis supplied.)

Our letter of January 31, 1977, also said the "procedures" would be effective as of July 31, 1977; it is uncontroverted that this commitment was met on July 28, 1977.

We are attaching with this letter (a) the requirement in Section B.2 of Appendix A to Branch Technical Position APSCB 9.5-1, which required the implementation of "administrative measures" to accommodate the "Housekeeping Requirement" of Regulatory Guide 1.39 referenced there (Section B.2), and (b) our "Housekeeping/Plant Cleanliness" instructions, which were in effect as of January 31, 1977. We are also attaching (c) the requirement in Section B.3.(c) of Appendix A to BTP 9.5-1 and (d) a copy of our formal procedures, "Control of Combustible Materials," which were in effect as of July 28, 1977, as we committed on January 31, 1977. We believed that Attachment (b) fulfilled the intent of the Housekeeping "measure" required in Attachment (a). Similarly Attachment (d) complied with the requirement of Attachment (c).

We are confident that your review of these enclosures, along with your reconsideration of our Response of March 1, 1982, will convince you that, at most, your inspectors may disagree with the adequacy of our "administrative measures," but that there is no basis at all for characterizing the January 31, 1977, submittal as false, and certainly it was not a material false statement.

It is to preserve this important distinction that we request reconsideration of this matter. If you personally continue to conclude that, indeed, this was a false statement, we will place this matter behind us.

THE UNITED STATES OF AMERICA

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT
WASHINGTON, D. C. 20250

MEMORANDUM FOR THE RECORD

SUBJECT: [Illegible text]

1. [Illegible text]

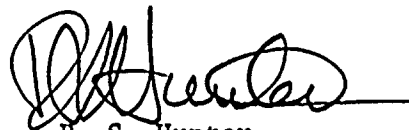
2. [Illegible text]

3. [Illegible text]

4. [Illegible text]

This document has been prepared following Corporate Procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,



R. S. Hunter
Vice President

/os

cc: John E. Dolan - Columbus
M. P. Alexich
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
NRC Resident Inspector at Cook Plant - Bridgman

1. The first part of the report is a general
description of the project and its objectives.
2. The second part is a detailed description of the
methodology used in the study.

3. The third part is a description of the
results of the study.

4. The fourth part is a discussion of the
results and their implications.
5. The fifth part is a conclusion and
recommendations.

6. The sixth part is a list of references.

7. The seventh part is a list of appendices.

Attachment to
AEP:NRC:0660E

APPLICATION DOCKETED BUT CONSTRUCTION
PERMIT NOT RECEIVED AS OF 7/1/76

7. Fuel Loading

The fire protection program for an entire reactor unit should be fully operational prior to initial fuel loading in that reactor unit.

8. Multiple-Reactor Sites

✓ On multiple-reactor sites where there are operating reactors and construction of remaining units is being completed, the fire protection program should provide continuing evaluation and include additional fire barriers, fire protection capability, and administrative controls necessary to protect the operating units from construction fire hazards. The superintendent of the operating plant should have the lead responsibility for site fire protection.

9. Simultaneous Fires

Simultaneous fires in more than one reactor need not be postulated, where separation requirements are met. A fire involving more than one reactor unit need not be postulated except for facilities shared between units.

B. Administrative Procedures, Controls and Fire Brigade

1. Administrative procedures consistent with the need for maintaining the performance of the fire protection system and personnel in nuclear power plants should be provided.

Guidance is contained in the following publications:

NFPA 4 - Organization for Fire Services

PLANTS UNDER CONSTRUCTION AND
OPERATING PLANTS

7. Fuel Loading

Schedule for implementation of modifications, if any, will be established on a case-by-case basis.

8. Multiple-Reactor Sites

SAME

9. Simultaneous Fires

SAME

B. Administrative Procedures, Controls, and Fire Brigade

SAME

APPLICATION DOCKETED BUT CONSTRUCTION
PERMIT NOT RECEIVED AS OF 7/1/76

PLANTS UNDER CONSTRUCTION AND
OPERATING PLANTS

NFPA 4A - Organization for Fire
Department

NFPA 6 - Industrial Fire Loss
Prevention

NFPA 7 - Management of Fire
Emergencies

NFPA 8 - Management Responsibility
for Effects of Fire on
Operations

NFPA 27 - Private Fire Brigades

2. Effective administrative measures should be implemented to prohibit bulk storage of combustible materials inside or adjacent to safety related buildings or systems during operation or maintenance periods. Regulatory Guide 1.39, "Housekeeping Requirements for Water-Cooled Nuclear Power Plants", provides guidance on housekeeping, including the disposal of combustible materials.
3. Normal and abnormal conditions or other anticipated operations such as modifications (e.g., breaking fire stops, impairment of fire detection and suppression systems) and refueling activities should be reviewed by appropriate levels of management and appropriate special actions and procedures such as fire watches or temporary fire barriers implemented to assure adequate fire protection and reactor safety. In particular:
 - (a) Work involving ignition sources such as welding and flame cutting should be done under closely controlled conditions. Procedures governing such work should be reviewed and approved by persons

2. SAME

3. SAME.

APPLICATION DOCKETED AT CONSTRUCTION

PLANTS UNDER CONSTRUCTION AND

PERMIT NOT RECEIVED AS OF 7/1/76

OPERATING PLANTS

trained and experienced in fire protection. Persons performing and directly assisting in such work should be trained and equipped to prevent and combat fires. If this is not possible, a person qualified in fire protection should directly monitor the work and function as a fire watch.

- (b) Leak testing, and similar procedures such as air flow determination, should use one of the commercially available aerosol techniques. Open flames or combustion generated smoke should not be permitted.

- (c) Use of combustible material, e.g., HEPA and charcoal filters, dry ion exchange resins or other combustible supplies, in safety related areas should be controlled. Use of wood inside buildings containing safety related systems or equipment should be permitted only when suitable non-combustible substitutes are not available. If wood must be used, only fire retardant treated wood (scaffolding, lay down blocks) should be permitted. Such materials should be allowed into safety related areas only when they are to be used immediately. Their possible and probable use should be considered in the fire hazard analysis to determine the adequacy of the installed fire protection systems.

4. Nuclear power plants are frequently located in remote areas, at some distance from public fire departments. Also, first response fire departments are often volunteer. Public fire department response should be con-

4. SAME

DONALD C. COOK NUCLEAR PLANT

PLANT MANAGER INSTRUCTION COVER SHEET

Attachment B

Instruction No. PMI 2090

Revision No. 1

TITLE Housekeeping/Plant Cleanliness

SCOPE OF REVISION

Rev. 1 Changed format to comply with PMI-2010 Rev. 5.
Deleted reference to contract cleaners.
Added responsibility for inspection of Containment and
balance of plant.

VOID

NOT FOR PLANT USE

VOID

NOT FOR PLANT USE

SEE

DOCUMENT #

*Revision #2
4/23/79 CJS*

INFORMATION
COPY ONLY

SIGNATURES

	ORIGINAL	REV. 1	REV. 2	REV. 3
PREPARED BY	<i>P. H. H.</i>	<i>P. H. H.</i>		
AEPSC QUALITY ASSURANCE REVIEW	<i>J. E. L.</i>	<i>J. E. L.</i>		
PLANT NUCLEAR SAFETY COMMITTEE	<i>W. S. Hall</i>	<i>W. S. Hall</i>		
AEPSC NUCLEAR SAFETY & DESIGN REVIEW COMMITTEE	<i>NA</i>	<i>NA</i>		
PLANT MANAGER APPROVAL	<i>[Signature]</i>	<i>[Signature]</i>		
DATE OF ISSUE	<i>10-21-74</i>	<i>10-22-75</i>		

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Rev. 1

3

Rev. 1

INDIANA & MICHIGAN POWER COMPANY
DONALD C. COOK NUCLEAR PLANT

SUBJECT: Housekeeping/Plant Cleanliness

FROM: Plant Manager

TO: Department Heads

OBJECTIVE

To establish the policy and administrative controls for housekeeping and plant cleanliness.

BACKGROUND

ANSI N45.2.3-1973 requires that housekeeping policies be established for all phases of plant activities. Indiana & Michigan Power Company Safety Manual Section G.9 established basic housekeeping policies for all of its organizations.

DETAILS

The plant shall be maintained clean at all times. Cleanliness is a prerequisite to efficient and safe operation.

The following are general levels of cleanliness which will be maintained:

Containment/Auxiliary Building

- | | |
|--|---|
| a) Refueling Cavities:
(Any lined cavity used for storage of fuel or borated water) | Follow cleanup procedures (for lined portions only) outlined in PO-020-200 Rev. 1. "Nuclear Systems General Flushing and Cleaning" procedures prior to flooding cavity for refueling. |
| b) Painted concrete surfaces: | Remove excess dust, dirt, grime and debris until the surface is visibly clean and dry. |
| c) Unpainted concrete surfaces: | Same as painted surface. |
| d) Electrical cable trays: | Maintain free of excess wire, debris paper, wood chips. |
| e) Plant equipment (exterior of equipment, supports, cranes, etc.) | Outside surfaces should be free of dirt, grime, grease and dry, consistent with the normal operating condition of the equipment. |

General cleaning throughout the plant will be performed by Utility men.

First line supervisors are responsible for insuring that the conditions existing in an area are satisfactory for conducting work prior to starting. (Reference - Safety Manual).

If an area or piece of equipment needs to be enclosed to assure the surrounding atmosphere is not detrimental to the equipment or the equipment detrimental to the surrounding area, such actions shall be accomplished prior to starting work.

The responsibility for cleaning the immediate surrounding area after work rests with the individuals performing the work.

* Inspections of completed work by first line supervisors shall also include inspection of the surrounding area for cleanliness, for removal of tools and equipment used to perform the work, for removal of fire hazards and proper disposal of scrap material and oily rags.

RESPONSIBILITY

Department Heads are responsible for developing controls within their respective departments to implement the requirements of this instruction.

The Operations Supervisor is responsible for conducting cleanliness inspections of the containment as required by the Appendix A Technical Specifications Section 4.5.2.b..

The Quality Assurance Supervisor is responsible for conducting monthly Housekeeping/Cleanliness inspections of the entire plant with the exception of the Containment.

MANAGEMENT REVIEW

Department Heads and first line supervisors are responsible for monitoring activities under their control to assure cleanliness is being maintained.

The In-Plant General Safety Committee shall conduct a quarterly cleanliness inspection of the plant as part of one of the safety observations they conduct.

INTERFACES

All plant personnel are interfaced by this instruction. Cleanliness is the responsibility of all personnel as a part of their job.

DISTRIBUTION

In accordance with the standard distribution list of PMI-2010.
Chairman of In-Plant General Safety Committee.

REPORTING

The results of the In-Plant General Safety Committee and Quality Assurance Supervisor inspections shall be sent to the Plant Manager and all Department Heads.

SCHEDULE

Housekeeping and Cleanliness are continuing activities.

INDIANA & MICHIGAN POWER COMPANY

DONALD C. COOK NUCLEAR PLANT

PLANT MANAGER INSTRUCTION COVER SHEET

Attachment D

Instruction No. PMI-2271

Revision No. 1

TITLE CONTROL OF COMBUSTIBLE MATERIALS

SCOPE OF REVISION

Rev. 1: Revised requirements for storage of flammable and combustible liquids.
Minor additions and editorial corrections made. Revised format.
Revisions indicated by marginal markings.

DCR

APR 13 1979

SIGNATURES

	ORIGINAL	REV. 1	REV. 2	REV. 3
PREPARED BY	<i>E. A. Abshey</i>	<i>W. M. C. Cook</i>		
AEPSC QUALITY ASSURANCE REVIEW	N/A	N/A		
PLANT NUCLEAR SAFETY COMMITTEE	<i>D. A. Durr</i>	<i>R. A. Durr</i>		
AEPSC NUCLEAR SAFETY & DESIGN REVIEW COMMITTEE	N/A	N/A		
PLANT MANAGER APPROVAL	<i>W. M. C. Cook</i>	<i>W. M. C. Cook</i>		
DATE OF ISSUE	7-28-77	3-20-79		

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Rev. 1, 3/20/79
Rev. 1, 3/20/79

INDIANA & MICHIGAN POWER COMPANY
DONALD C. COOK NUCLEAR PLANT

TITLE Control of Combustible Materials

OBJECTIVE

To establish the administrative controls for the control of flammable and combustible materials used at the Donald C. Cook Nuclear Plant.

BACKGROUND

Appendix A to Branch Technical Position APCS 9.5-1 "Guidelines for Fire Protection for Nuclear Power Plants Docketed Prior to July 1, 1976", requires in part that the use of combustible supplies in safety related areas be controlled.

DETAILS

This instruction is applicable to any flammable or combustible materials, liquids, or gases used in the Plant. Some restrictions apply only to safety related areas of the Plant. For the purpose of this Instruction, safety related areas are the Containment and safety related equipment rooms (i.e., CTS, SI, RHR pump rooms) of the Auxiliary Building, and the 4KV switchgear rooms, cable vaults, cable tunnels, battery rooms and Emergency Diesel Generator rooms.

The controls established for materials, liquids and gases are described following:

Materials

Combustible materials such as HEPA and charcoal filters, dry ion exchange resins, wood, paper and cardboard, shall be controlled as follows:

1. HEPA and charcoal filters and dry ion exchange resins are normally replacement items that are stored when not in use. When replacing these items in safety related areas, only the amount that will be used during the work shift should be brought into the area. Used filters and resins shall be removed from the safety related area when the work is completed and taken to a suitable location (i.e., drumming room) for storage or disposal. Under no circumstances will these items be left in the safety related area.

2. Rags shall be removed from safety related areas at the completion of the work and taken to a suitable location for disposal. Care should be taken to prevent the accumulation of used rags in the safety related area while work is in progress.

Rags used in non-safety related areas of the Plant should not be allowed to accumulate where they might become a fire hazard. Rags should be disposed of or properly stored.

3. Wood may be used for scaffolding in safety related areas only when suitable noncombustible substitutes are not available. If wood must be used, only fire retardant treated wood (scaffolding; laydown blocks) will be permitted. Wood, when used, must be removed immediately after completion of its use from safety related areas. It is permissible to use wood ladders in safety related areas providing they are removed following completion of work.

Wood used in non-safety related areas of the Plant for scaffolding, laydown, temporary structures or other uses should be fire retardant treated.

4. Shipping crates or containers should be removed from equipment or material prior to those items being taken into a safety related area. If removal is not feasible, it is permissible to take these containers into a safety related area provided the containers are removed from the area as soon as uncrating is completed.
5. Paper, cardboard and other trash shall not be left to accumulate in safety related areas.

Paper, cardboard and other trash should not be left to accumulate in non-safety related areas of the Plant except in containers intended for the disposal of such debris.

Liquids

Flammable and combustible liquids such as acetone, alcohol, fuel oil, gasoline or tuluol shall be controlled as follows:

1. Flammable or combustible liquids shall only be transported and stored in safety containers equipped with flame arrestors. This requirement does not apply to such liquids as heavy weight oils which will not pour through the screen of a flame arrestor.

Flammable or combustible liquids in non-safety related areas shall be stored in a designated area or safety cabinet and, when opened for use, transferred from shipping containers to safety containers with flame arrestors. Small quantities of liquids for use in shops, labs, etc., need not be stored in safety containers.

2. Flammable or combustible liquids used in safety related areas shall not be used or placed near heat or open flame. This restriction should also be observed in non-safety related areas.
3. When using flammable or combustible liquids in safety related areas a fire extinguisher shall be in the immediate area. This practice should be observed in non-safety related areas as well.

Compressed Gases

Compressed gases in portable tanks such as oxygen, and flammable compressed gases such as acetylene, or aerosol cans containing flammables shall be controlled as follows:

1. The use of oxyacetylene torch equipment shall be in accordance with PMI-2275, Fire Prevention - Control of Ignition Sources.
2. Leaking cylinders, valves, fittings or aerosol cans shall not be used.
3. Adequate ventilation must be available.
4. Upon completion of work, compressed gas containers or aerosol cans shall be removed from safety related areas.
5. Compressed gas cylinders, in use or in storage, shall be adequately secured in an upright position to prevent them from being accidentally tipped over.

RESPONSIBILITY

Department Heads are responsible for assuring that the policy and administrative controls established by this Instruction are implemented within their respective Departments.

Department Heads are responsible for assuring that new employees within their Department receive indoctrination in these requirements. This indoctrination shall be documented.

The Plant Manager or the Assistant Plant Manager is responsible for resolving problems which arise during the implementation of this instruction.

It is the responsibility of all Plant personnel to adhere to the requirements of this Instruction.

MANAGEMENT REVIEW

Department Heads are responsible for reviewing the effectiveness of the implementation of the requirements of this Instruction within their respective Departments.

INTERFACES

All Departments are required to adhere to this Instruction. DHI's to implement this Instruction are not required.

DISTRIBUTION

Per PMI-2010, and SOE Office.

REPORTING

There are no reports required by this Instruction. However, violations of this Instruction shall be reported via a Condition Report in accordance with PMI-7030.

SCHEDULE

This Instruction is effective on date of issue.

