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 FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
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 ALEXICH,M.P. Indiana & Michigan Electric Co.
 RECIP.NAME RECIPIENT AFFILIATION
 DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Explains & justifies items in nonoutage work schedule which cannot be completed by 840620. Requests scheduler exemption from 10CFR50, App R, Sections III.G.2, III.G.3 & III.J extending compliance date to 841231.

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March 8, 1984
ARP:NRC:0692L

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
REQUEST FOR SCHEDULAR EXEMPTIONS FROM REQUIREMENTS
OF APPENDIX R TO 10 CFR 50, SECTIONS III.G.2, III.G.3 and III.J
FOR DONALD C. COOK NUCLEAR POWER PLANT UNIT NOS. 1 AND 2

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

This letter is in response to your letter from Mr. Varga to Mr. Dolan dated December 23, 1983 and related discussions with members of your staff. In that letter you issued exemptions to certain technical requirements of Section 50.48 and Appendix R to 10 CFR 50. That letter also requested that further information be transmitted to you regarding schedular and technical exemptions including sufficient information on the specific items requiring such exemption, demonstration that we have made our best effort to complete the modifications, and justification for continued operation including compensatory measures to be taken during the period of schedular exemptions. You indicated that we should not only discuss any installations included by reference in your December 23, 1983 letter, but also with regard to those in the Alternate Safe Shutdown Letter (dated November 22, 1983), and any other modifications necessary for compliance with the regulations. You also requested this information to be transmitted to you within 60 days of our receipt of your letter which was received on January 9, 1984.

It is our understanding that we are to explain and justify any items in our non-outage work schedule which cannot be completed by June 20, 1984. June 20, 1984 is 180 days from the date of your SER and is the compliance time period we understand to be applicable in accordance with 10 CFR 50.48 Paragraph (c)(4). A re-examination of our program indicates that we cannot complete all such items for Unit 1 within the 180 days required after issuance of the SER. The items affected are:

- (a) modification to the fire suppression system in fire zone 79;
- (b) the installation of dampers in fire zone 1 and 62C;
- (c) installation of conduit and tray fire protection wraps in fire zone 79,

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- (d) the installation and repair of numerous fire doors on the attached list*, and
- (e) the installation of seals and fire stops in fire zones 49, 62A, B, C.

For the above noted items we are requesting a schedular exemption extending the compliance date to no later than December 31, 1984. This extension is requested because the magnitude of work required to be completed by June 20, 1984, has increased by a factor of 3 (from an estimated cost of eight million dollars in our March 83 assessment to over 20 million dollars now estimated for completion). This increase in work load, coupled with the time it takes to process and install engineering changes, precludes the possibility of accelerating the previous schedule submitted to you in our March 31, 1983 submittal (AEP:NRC:0692E).

All of our modifications required for alternate shutdown are outage related. Our present schedule is to have these modifications completed on each unit during its respective refueling outage in 1985. The Unit 1 outage is tentatively scheduled to begin in February, 1985. The Unit 2 outage is scheduled to begin in September, 1985.

These outages are the first to commence later than six months after receipt of the SER (Nov. 22, 1983). There are several modifications required in one unit to support alternate shutdown in the other unit. In our March, 1983 submittal we indicated that the refueling outages would be overlapping allowing crossties to be made at the same time. This no longer is the case. The Unit 1 refueling outage will be shorter than originally planned and the Unit 2 outage will start later than originally planned. Therefore we request a schedular exemption from the requirements of 10 CFR 50.48 (c)(4) for completing the Unit 1 modifications which require crosstie to Unit 2 until we have completed the 1985 Unit 2 refueling outage. The items affected are:

- (a) the installation of a chemical volume control system crosstie;
- (b) The installation of alternate power source for Unit 1 local shutdown panels (LSI), and
- (c) the installation of alternate power source for the pressurizer heaters and the residual heat removal pumps.

Our schedular exemption request is made based on the fact that certain tie-ins necessary for completion of these items require a Unit 2 outage.

We request that the date for compliance with Section III.J. be extended to two months beyond the end of the 1985 Unit 2 refueling outage and completion of the installation of the alternative shutdown systems per III-G.3. The emergency lighting requirements of III.J. must be consistent with the modifications being proposed for compliance with Section III.G.3 of Appendix R. To ensure the correct placement of lighting, a walk-through of the new alternate shutdown procedure will be necessary. To allow time for this walk-through, a schedular exemption is requested.

* This part of the schedular exemption extending the completion date to December 31, 1984 also applies to Unit 2 fire doors.

We believe that under the existing circumstances we have demonstrated a sincere effort to implement the Appendix R 10 CFR 50.48 requirements at the Donald C. Cook Nuclear Plant. However, for those items discussed in this letter as a compensatory measure to continue operation until they are complete, we propose that a program of daily fire inspections of the various areas be established. For non-outage items, we propose to perform these inspections in fire zones 1, 49, 62A, B, C, and 79 from June 20, 1984, until the items are complete. For alternate shutdown items, we propose to perform these inspections in fire zones 6N, 44N, 14, 53, 55, 56, 57, 40A, B, 41, 42A, B, C, and D from the end of Unit 1 Refueling outage until the end of Unit 2 Refueling outage in 1985.

In addition to the above, we will require technical exemptions in the following two areas.

- (a) In our original submittal, we committed to provide 3 hour fire protection rated hatches in the control room, in the access control area, in the switch gear rooms, and in the cable vault rooms. In our efforts to implement this commitment, we have not been successful in finding a commercially available hatch that fully satisfies these requirements. We propose to protect these hatches by applying the best known engineering practices. This includes applying sufficient insulation on the portions of the hatches that can be insulated to provide the required 3 hour rating, but having to leave some of the mechanical portions of the hatches exposed. This will result in some portions of the hatches having less than a three hour rating, but these areas should be minimal and should not allow for the spread of fire from one area to another. Since we will not be in compliance with the literal requirements of this commitment, we must request an additional technical exemption for these hatches.
- (b) Another area which may require a technical exemption is the commitment to provide a 3 hour fire barrier around the hot shutdown panels. Following our preliminary assessment communicated to you in our March 1983 submittal, we performed a more detailed engineering and design review. This review has indicated that a three hour fire barrier as presently designed may not be technically feasible because of space limitations. Alternative resolutions are being pursued. As the engineering develops we will be in a better position to assess our progress in relation to the schedule. As of now we do not know whether we will require a technical exemption in this area but once engineering resolution has been achieved, we reserve the right to request an additional technical exemption.

We will continue our review of our Appendix R effort during the engineering design and installation phases and we will notify the NRC of any other deviations which may develop.

This letter 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,



M. P. Alexich
Vice President

OK
3/5/84

MPA/cm

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
E. R. Swanson, NRC Resident Inspector - Bridgman

ATTACHMENT 1
LIST OF FIRE DOORS TO BE REPLACED
D.C. COOK PLANT RFC-DC-12-2746

UNIT 1

DOOR NO.	FIRE ZONE	DOOR NO.	FIRE ZONE
226	17D	372	56
227	17E	373	6N
230	17C	385	38
317	15	387	38
319	16	389	43
323	9	390	43
329	9	401	57
333	8	423	57
339	10	436	70
347	40A	517	33A
357A	40B	519	33A
359	41		

BETWEEN UNITS 1 & 2

367	4	431	32
368	4	455	3
380	32		

UNIT 2

228	17F	348	47A
229	17G	358A	47B
231	17C	374	65
318	19	386	39
320	18	388	39
324	25	402	58
326	24	410B	107
330	25	424	58
334	26	439	19
340	24	470	39
342	47B		