

# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
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November 21, 1983  
AEP:NRC:0825A

Donald C. Cook Nuclear Plant  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
FOLLOWUP REPORT TO IE REPORT  
No. 50-315/83-07; 50-316/83-08

Mr. James G. Keppler  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter serves as our followup response to: 1) Mr. W. G. Smith, Jr.'s letter (AEP:NRC:0825) dated July 1, 1983, which responded to NRC Inspection Report No. 50-315/83-07; 50-316/83-08; and 2) subsequent telephone conversations between the NRC Region III, AEPSC, and the Donald C. Cook Nuclear Plant staff. More specifically, this letter serves to complete our response with regard to the findings on our Plant Master File Room.

Mr. Smith's July 1, 1983 letter, in response to Item (b) of the Notice of Violation associated with the subject report, stated that the File Room door would be replaced with a three hour, Class "A" fire door. However, as our evaluation progressed, a question arose as to whether this corrective action was sufficient. We have since completed an evaluation of the fire resistance capability of the Plant Master File Room. A copy of this report is attached to this letter (Attachment A).

Our review shows that upon implementation of the corrective actions set forth in Section D of Attachment A, the Cook Plant Master File Room will comply with the intent of NUREG-0800, 7/81, Chapter 17, Paragraph 17.4, Option 3 for a records storage facility. Administrative actions have been initiated to implement the design changes described in Section D of Attachment A.

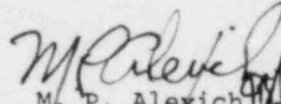
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This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

  
M. P. Alexich  
Vice President

MPA/cam

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

ATTACHMENT A  
TO  
AEP:NRC:0825A

A. AEPSC Position

The record storage facility in the office building is to be classified as a fire resistant file room (Plant Master File Room).

Upon implementation of the corrective actions set forth in Section D of this attachment, the Plant Master File Room will comply with the NRC Standard Review Plan NUREG-0800, 7/81, Chapter 17, Paragraph 17.4, Option 3, which specifies:

"A 2-hour rated fire resistant file room meeting NFPA No. 232 (-1975) if the following additional provisions are provided:

1. Early warning fire detection and automatic fire suppression should be provided, with electronic supervision at a constantly attended central station.
2. Records should be stored in fully enclosed metal cabinets. Records should not be permitted on open steel shelving. No storage of records should be permitted on the floor of the facility. Adequate access and aisle ways should be maintained at all times throughout the facility.
3. Work not directly associated with records storage or retrieval should be prohibited within the records storage facility. Examples of such prohibited activities include but are not limited to: records reproduction, film developing, and fabrication of microfiche cards.
4. Smoking and eating/drinking should be prohibited throughout the records storage facility.
5. Ventilation, temperature, and humidity control equipment should be protected inside with standard fire-door dampers where they penetrate fire barriers bounding the storage facility."

B. Compliance with NFPA 232 - 1975

The Plant Master File Room as it is currently constructed, has been compared with NFPA 232 -1975 (Code) requirements for fire resistive file rooms. The following deviations were noted:

1. Floor

The Code requires a six (6) inch minimum concrete floor versus the 2½ inch concrete on 1½ inch steel decking with 2 hours fire resistive spray-on fireproofing of the Master File Room floor.

The Code does not permit the floor to be penetrated (e.g., conduit, piping, etc.). The Master File Room floor has two conduit penetrations which have been fully sealed with approved, fire penetration sealant to maintain a 2-hour fire resistance rating.

The Code requires a non-combustible floor covering. The Master File Room floor is covered with a resilient tile with a vinyl base which is fire retardant.

#### Discussion

Since the Plant Master File Room is protected with an automatic CO<sub>2</sub> system, the above deviations are considered minor.

## 2. Walls

"The walls of the Plant Master File Room are considered as fire partitions per the definition of NFPA."

The Code requires hollow block walls to be finished with either 1/2 inch thick gypsum or portland cement plaster on both sides. The Plant Master File Room walls have been plastered with 5/8" of gypsum on the interior and exterior surfaces.

The Code does not permit openings through the walls for air conditioning ducts. The walls of the Master File Room are pierced in three places by A/C ducts (one duct passed through the room, and one provides ventilation above the drop ceiling). These ducts currently have 1 1/2-hour fire rated dampers.

We have determined that the walls have a 4-hour fire resistance rating.

#### Discussion

The 4-hour fire resistance rating of the walls, in combination with the plaster coating, provides more protection than the required 2-hour fire resistive rating.

While the Code does not permit the wall to be penetrated for air conditioning/ventilation ducts, it does recognize that ventilation may be necessary and presents alternatives in Section 333 which is basically to follow NFPA 90-A. The Standard Review Plan also recognized that ventilation may be necessary. However, in order to comply with NFPA 90-A and the Standard Review Plan "additional provision No. 5," the fire dampers on the ventilation ducts must be replaced with 3-hour Class A dampers with fusible link closing devices (See Section D.2).

3. Roof

The Code requires a six (6) inch minimum concrete roof versus the 2 inch rigid insulation on steel decking with 2-hours fire resistive spray-on fireproofing of the Plant Master File Room roof.

Discussion

The roof of the Plant Master File Room is the external roof of the office building. The fire exposure to the Plant Master File Room through this roof from an external fire is considered to be very low because there are essentially no sources for such a fire. The Plant Master File Room has an automatic CO<sub>2</sub> fire suppression system and the records therein are stored in steel cabinets. Therefore, the above deviation is considered as minor.

4. Doors

The Code requires the Plant Master File Room door to have a fire resistance capability equivalent to that required for the walls (2 hrs). The door on the Plant Master File Room has a 1½-hour fire rating and must be replaced with a Class "A", 3-hour fire door (See Section D.1).

5. HVAC

Refer to Section B.2 above.

6. Miscellaneous

The Code does not permit any "pipes" in the Plant Master File Room. The CO<sub>2</sub> suppression system piping penetrations are fully sealed with an approved fire penetration sealant to maintain a 2-hour fire resistance rating. The Standard Review Plan permits "piping" in the room for fire suppression and electrical service.

The Code requires that storage equipment/cabinets in the Plant Master File Room be noncombustible. The Plant Master File Room has a raised wooden deck covered with carpet in the area of the record storage equipment, however both of these items are fire retardant materials. We believe this deviation is acceptable on the basis that the Plant Master File Room has a fire detection system and automatic suppression system, that the fire exposure from external sources is low (see Section B1 through 3), and that administrative procedures are in place to minimize exposure to fire from "internal" sources.

C. Compliance With the Five (5) "Additional Provisions" of NUREG-0800, 7/81, Chapter 17, Paragraph 17.4, Option 3 (refer to Item A above).

1. The Plant Master File Room has a fire detection system and automatic CO<sub>2</sub> suppression system that upon activation, alarms in the Unit One Control Room. The Control Room is a constantly attended central station.

2. The record storage cabinets in the Plant Master File Room are constructed of steel, but in their current configuration does not provide "fully enclosed" metal cabinets. Based on the discussion in B1 through B4, B6 and C1 above, this is considered a minor, but acceptable deviation.
- 3&4. Access to the Plant Master File Room, and the control of activities therein, is specified in Plant Procedures that implement these requirements.
5. Refer to Item B.2 above.

D. Actions to be Taken

1. Replace the Master File Room door with a Class A, three (3) hour fire rated door with automatic closer to activate upon operation of the CO<sub>2</sub> suppression in the room. This door must be equipped so that personnel can open it from inside the room.
2. Replace the dampers on the through duct and duct opening into the Master File Room with three (3) hour, Class A, fire rated dampers with an automatic closing mechanism activated by the appropriately rated thermal link.

RFC DC-12-1924 has been initiated to effect the above described changes, and we anticipate the full implementation of these changes by June of 1984.

E. Conclusion

With the changes described in items D.1 & D.2 above in place, we believe that the Plant Master File Room will provide a records storage facility that meets the intent of NUREG-0800, 7/81, Chapter 17, Paragraph 17.4, Option 3.