

April 26, 2001

C0401-10

Environmental Technical Specification 5.4.1.

Docket Nos.: 50-315

50-316

U. S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Mail Stop O-P1-17

Washington, D.C. 20555-0001

#### Donald C. Cook Nuclear Plant Units 1 and 2 ANNUAL ENVIRONMENTAL OPERATING REPORT

Enclosed is the Donald C. Cook Nuclear Plant Annual Environmental Operating Report. This report covers the period from January 1, 2000, through December 31, 2000, and it was prepared in accordance with the requirements of Environmental Technical Specification 5.4.1.

Should you have any questions, please contact Mr. Ronald W. Gaston, Manager of Regulatory Affairs at (616) 697-5020.

Sincerely,

Scot A. Greenlee

Director of Design Engineering and Regulatory Affairs

/dmb

Attachment

c: J. E. Dyer

MDEQ - DW & RPD, w/o attachment

NRC Resident Inspector

R. Whale, w/o attachment

1625

# ATTACHMENT TO C0401-10 ANNUAL ENVIRONMENTAL OPERATING REPORT

## Annual Environmental Operating Report

January 1 through December 31, 2000

Indiana Michigan Power Company Bridgman, Michigan

Docket Nos. 50-315 & 50-316 License Nos. DPR-58 & DPR-74

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II.	Environmental Screening Reports - 2000
III.	Herbicide Application Report - 2000

#### I. <u>INTRODUCTION</u>

Technical Specifications Appendix B, Part 2, Section 5.4.1, requires that an Annual Environmental Operating Report be produced and include summaries and analyses of the results of the environmental protection activities required by Section 4.2 of the Environmental Protection Plan for the report period. The Annual Environmental Operating Report shall include a comparison with preoperational studies, operational controls (as appropriate), previous non-radiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment.

This report serves to fulfill these requirements and represents the Annual Environmental Operating Report for Units 1 and 2 of the Donald C. Cook Nuclear Plant for the operating period from January 1 through December 31, 2000.

The following table summarizes the pertinent data concerning the Plant's operation during the period from January 1 to December 31, 2000.

<u>Parameter</u>	Unit 1	Unit 2
Gross Electrical Generation (MWH)	457,392	4,950,860
Unit Service Factor (%)	2.8	51.9
Unit Capacity Factor–MDC* Net (%)	1.5	51.4

#### II. CHANGES TO THE ENVIRONMENTAL TECHNICAL SPECIFICATIONS

There were no changes to Environmental Technical Specifications in 2000.

#### III. NON-RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

#### A. Non-Routine Reports

A summary of the 2000 non-routine events is located in Appendix I of this Report. No long-term, adverse environmental effects were noted.

#### B. Environmental Protection Plan

There were no instances of Environmental Protection Plan noncompliance in 2000.

#### C. Plant Design and Operation

During 2000, there were no changes in station design, operations, tests, or experiments which involved a potentially significant unreviewed environmental issue. There were no environmental evaluations performed during the reporting period. Additional project environmental reviews performed in 2000 that were associated with the environmental evaluation for the Unit 1 Steam Generator Replacement Project reported in the 1999 Annual Environmental Operating Report are included in Appendix II of this report.

### D. Environmental Monitoring – Herbicide Application

Herbicide applications are the activities monitored in accordance with Technical Specification Appendix B Section 4.2. There were no pre-operational herbicide studies to which comparisons could be made. Herbicide applications are managed by plant procedure PMP 2160 HER.001.

A summary of the 2000 herbicide applications is contained in Appendix III of this report. Based on observations, there were no negative impacts or evidence of trends toward irreversible change to the environment as a result of the herbicide applications. Based on our review of application records and field observations, the applications conformed to EPA and State requirements for the approved use of herbicide.

APPENDIX I

NON-ROUTINE REPORTS

2000

#### 2000 Non-Routine Events

<u>January 18, 2000</u> - At 0030 hours, a hydraulic line failed on one of the plant's cranes. The cracked line leaked approximately 5-20 gallons of hydraulic oil to the ground.

<u>February 14, 2000</u> - At 1130 hours, the main sanitary wastewater line to the plant's sewage plant became blocked. The blocked line caused the sanitary wastewater to back up, spilling approximately 10 gallons of sanitary wastewater to the ground via two cleanout access pipes.

March 24, 2000 - During a routine inspection of the stormwater system, an illicit connection to the plant's North Stormwater Outfall (#001S) was discovered. During a renovation at the plant's office complex, a coffee station and sink were installed. The drain from the sink was routed to a floor drain that drained directly to the storm drain system.

March 26, 2000 - At 1600 hours, a hydraulic line failed on the plant's 55-ton mobile crane. The cracked line leaked approximately 5-20 gallons of hydraulic oil to the ground.

April 19, 2000 - At 1515 hours, the discharge from the North Storm Water Outfall (001S) was noted to be cloudy, turbid, and contained a small amount of foam. No oily sheen was noted. This condition we believe, was caused by a "first flush" of the storm system during this rain event.

June 17, 2000 - At 1336 hours, the Alternate Plant Heating Boiler blowdown line leaked approximately 15 gallons of condensate to a catch basin. The condensate contained up to 3.1 ppb hydrazine and <0.3 ppm ethanolamine based on samples taken on June 16, 2000 from the boiler.

September 29 through October 4, 2000 - A visual observation for oil sheen at the absorption pond was not performed as required. The plant's new groundwater permit M00988 was issued on September 29, 2000 and became effective on this date. The new permit included a provision for a daily visual observation of the plant's absorption pond for presence of an oil sheen. Plant personnel became aware of this daily visual observation requirement upon receipt of the new permit on October 5, 2000. Plant personnel commenced the required daily inspections along with the other requirements of the permit on the date of receipt. A letter of response dated November 14, 2000 from the Michigan Department of Environmental Quality determined that the reasons for the lack of monitoring were reasonable and no further action would be taken on this issue.

<u>December 4, 2000</u> - At 1324 hours, approximately 1500 gallons of water was discharged to Outfall 00D with a pH value of 2.4. The discharge was necessary to prevent flooding of equipment and also avoid discharging to Lake Michigan.

<u>December 18, 2000</u> - At 1400 hours, a hydraulic line failed on a contractor's excavator. The cracked line leaked approximately 20 gallons of hydraulic oil to the ground.

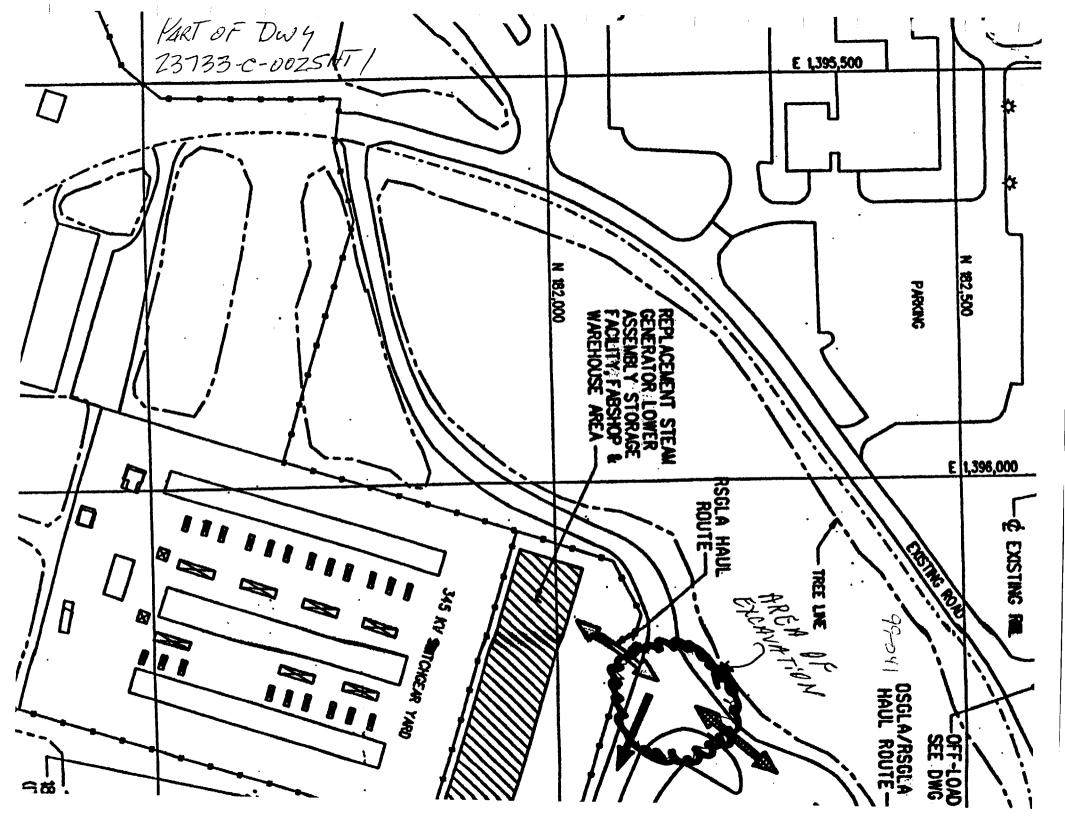
<u>December 22, 2000</u> - At 2121 hours, approximately 1500 gallons of water was discharged to Outfall 00D with a pH value of 2.4. The discharge was necessary to prevent flooding of equipment and also avoid discharging to Lake Michigan.

# APPENDIX II ENVIRONMENTAL SCREENING REPORTS 2000

### ATTACHMENT A SGRP ENVIRONMENTAL REVIEWS

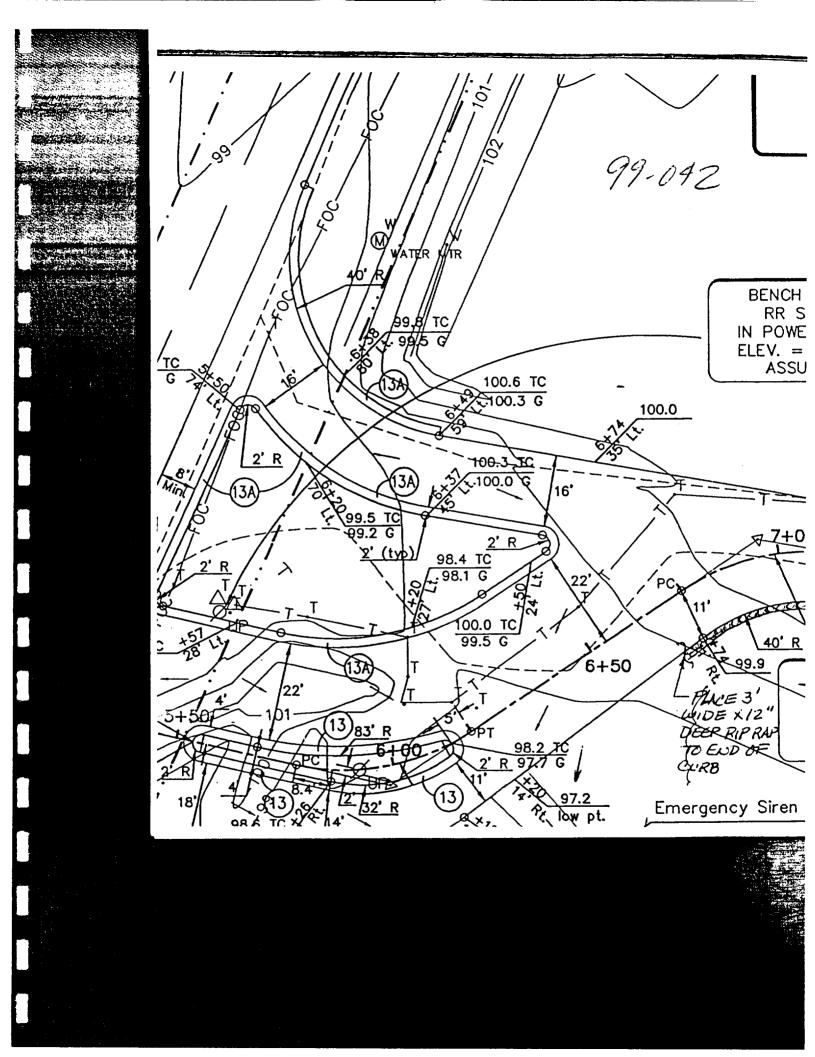
	99-041	Repair road north of the 345 kV Switch yard.	11/1/99
Report	99-042	Construct swale to convey runoff from new intersection at Red Arrow Highway.	12/15/99
	99-043	Park SGRP RP Consumables Trailer 45' overland enclosed located near the sewage plant.	10/13/00
tin	99-044	Dig trenches between SGRP Building and north and south trailers.	3/29/00
Operating	99-047	Increase road width north of 345 kV yard and slope bank on a 2/1 slope.	12/7/99
1	99-049	Excavate trench to install permanent electrical feed to the steam generator mausoleum. Trench to be backfilled using spoils material.	3/29/00
en	99-051	Install parking lot signs at the SGRP Office.	1/7/00
Environmental	99-053	Secure leveling plate around catch basin north of the RPAC.	2/16/00
	00-02	Convert storage building into SGRP Decon Facility.	10/17/00
Ϋ́	00-03	Repair existing H <sub>2</sub> O valve box and roadway.	7/17/00
	00-04	Provide temporary test area, pumper area, chute, washout area and spoil concrete area to support restoration of Unit 1 concrete S/G enclosures.	8/9/00
Annual	00-08	Use area adjacent to Environmental Spoils Yard to store Unit 1 SGRP Seavans.	1/2/01
2000	00-29	Remove temporary power feed from junction panel to temporary Change and Purchasing trailers. Also, install soil erosion material as required.	9/20/00

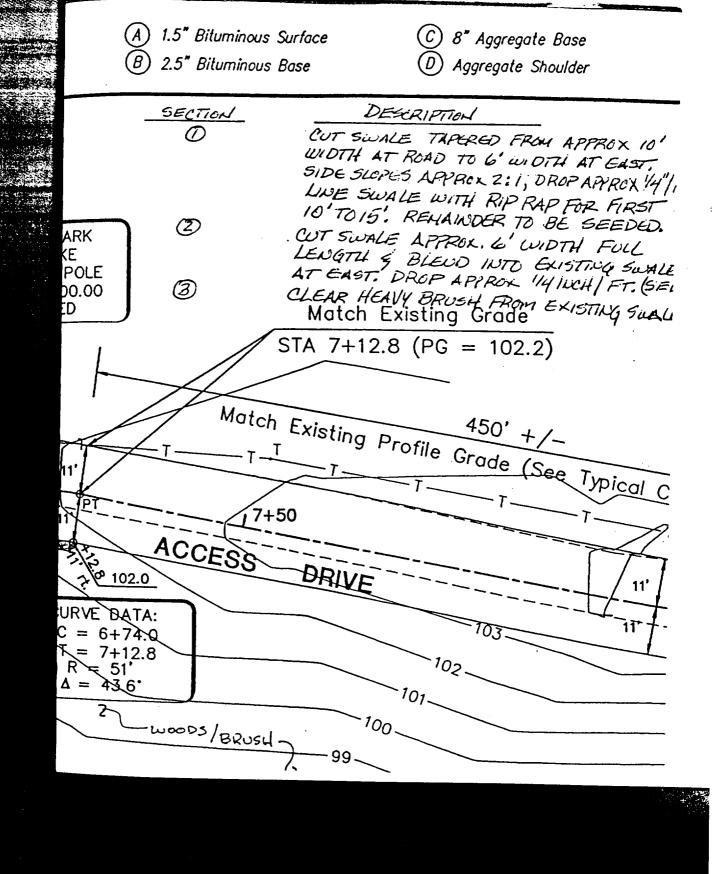
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	<b>3.</b>	Potential permit or plan requirements/changes	
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	4.	Additional comments:	
		to Permits work is I Road way	only
		Reviewer/Evaluator General Supervisor - Environmental Review	Date 5-25-99  Date 5-25-99
			Page 1 of 1 Revision 0



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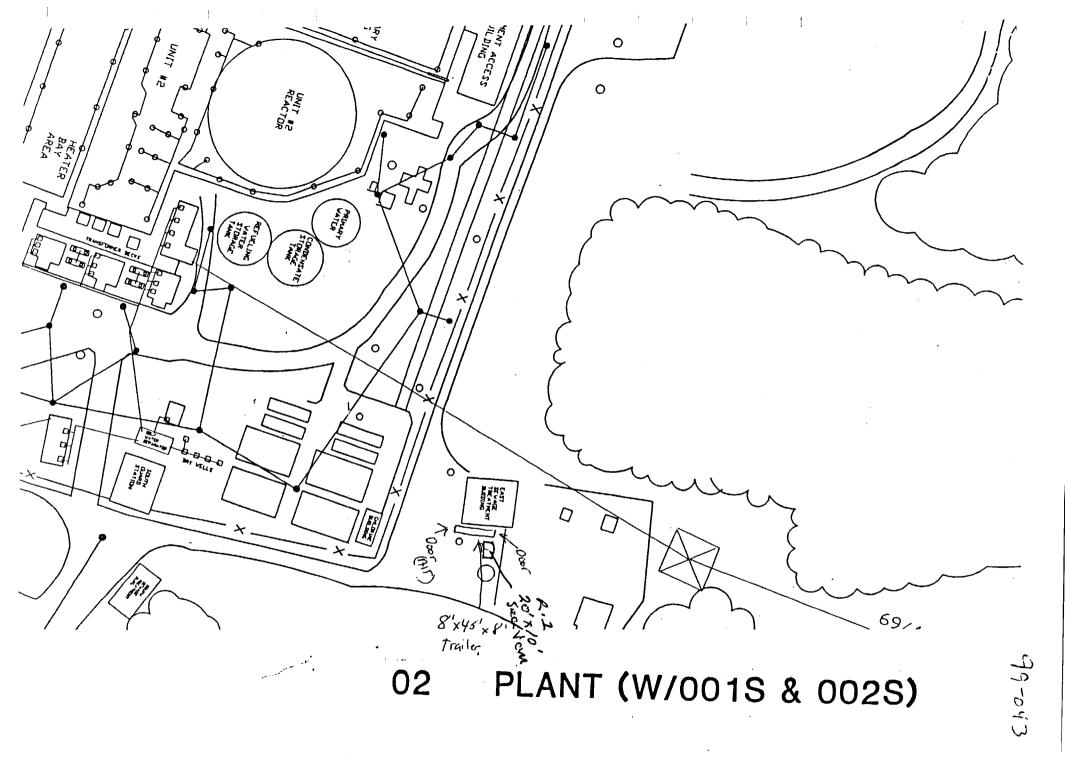
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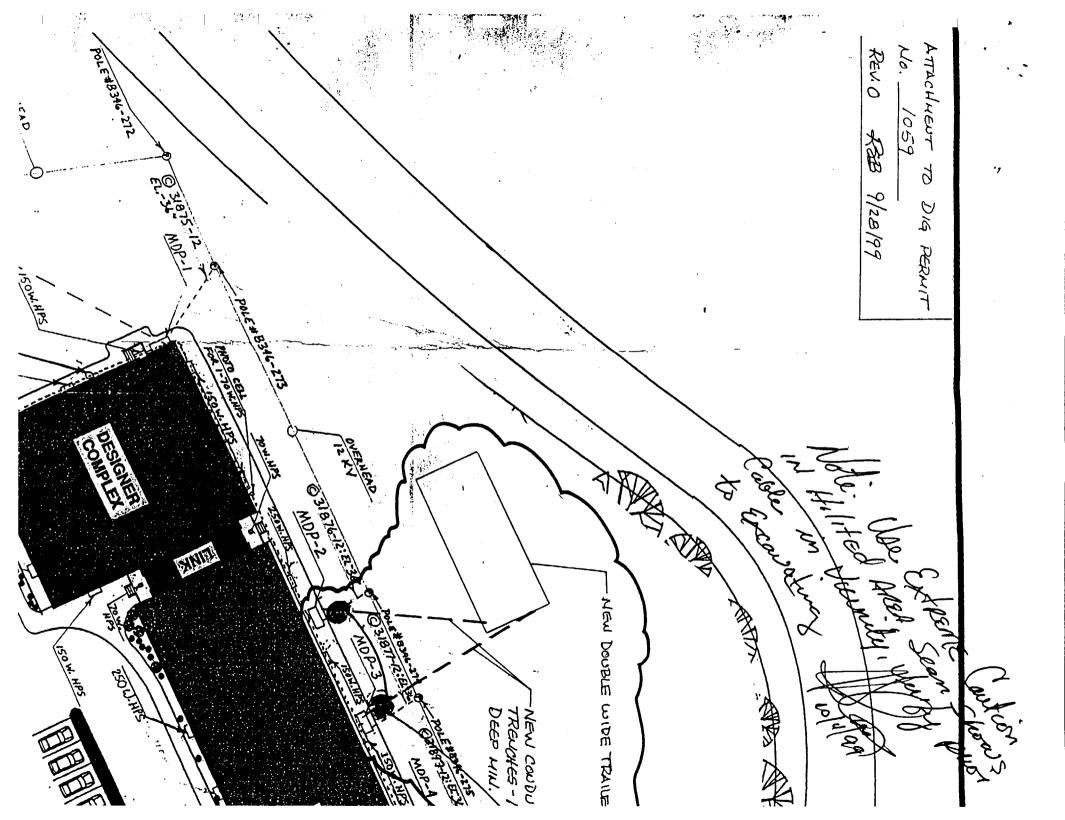
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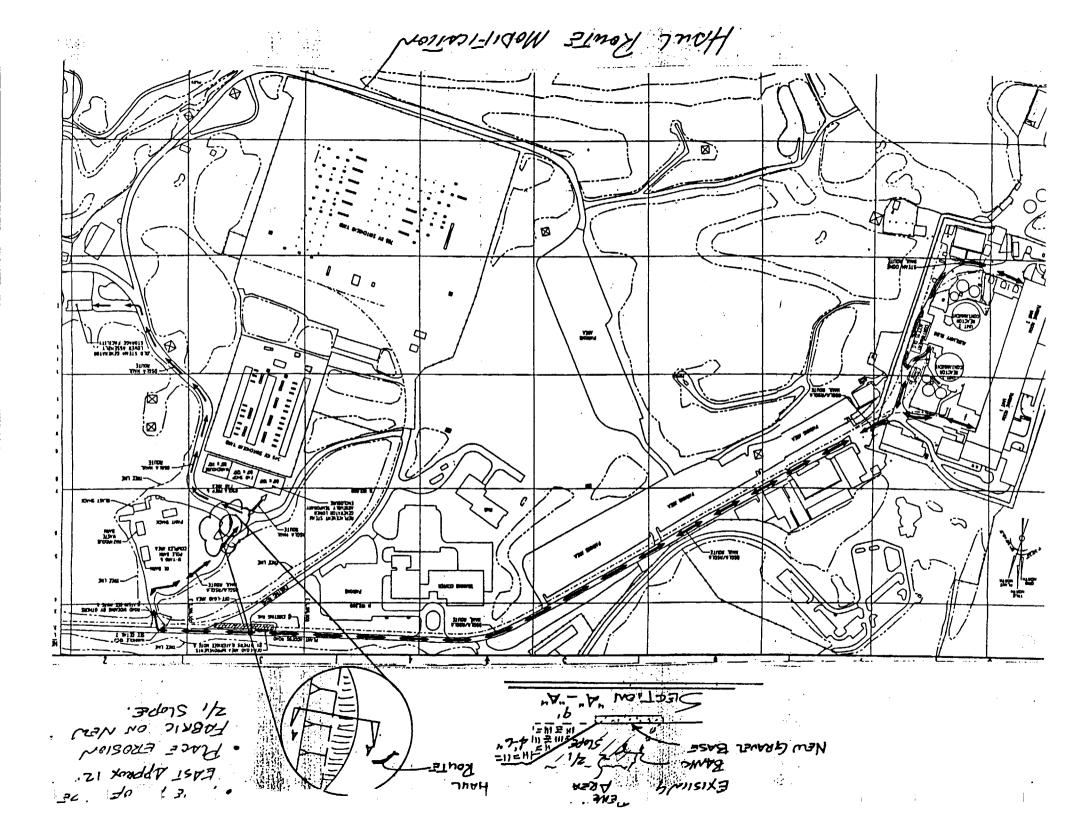
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		TRENCH FROM PARKL MOP - 3 TO NORTH THAILER . BOTH THENCHES
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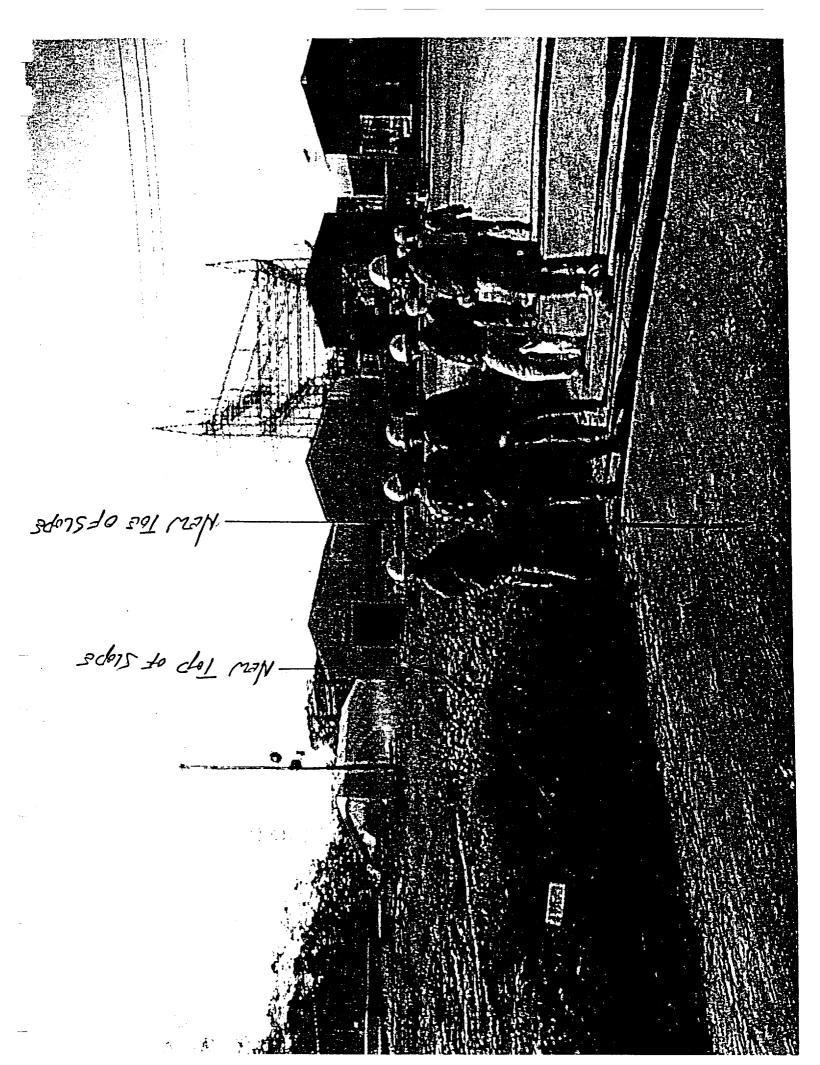
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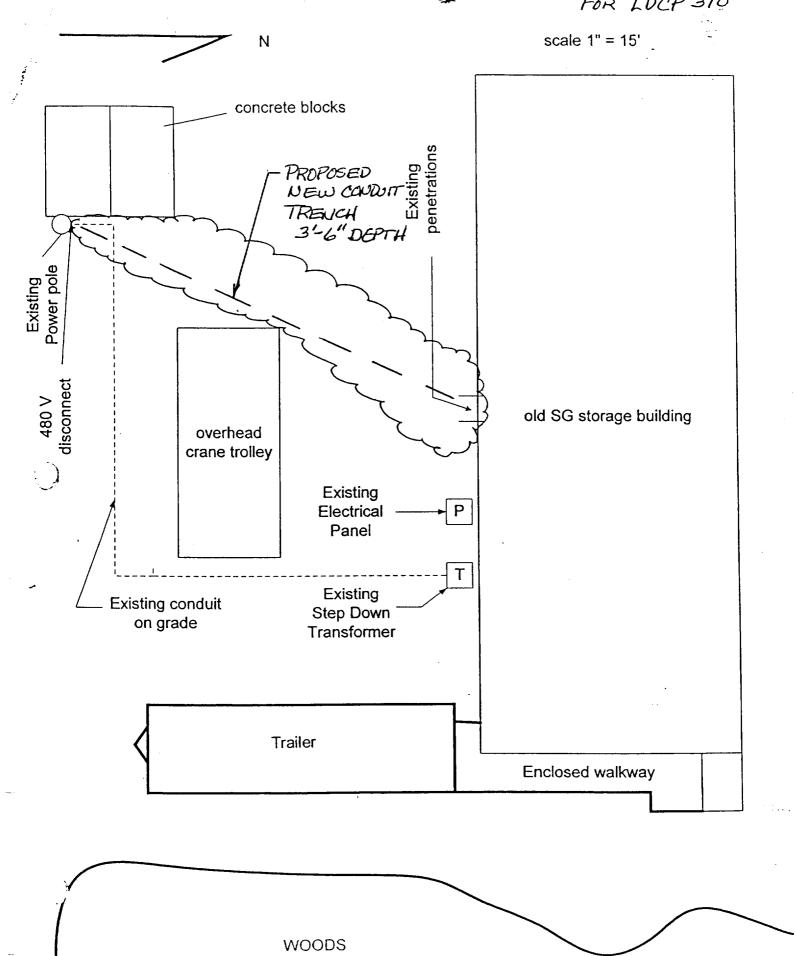


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	4.	Additional comments:
		Reviewer/Evaluator General Supervisor - Environmental Review Shape Date 11/29/99

Page 1 of 1 Revision 0

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Page 1 of 1 Revision 0

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J.O. #	<u> </u>	Revision # 1
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	0. The PlasBla	rmit revision is to change the decontamination processes from those described in revision CO <sub>2</sub> and sponge blast processes included in the Master-Lee proposal will not be used. A st self-contained plastic bead-blasting unit supplied by Bartlett will now be used. The pead media is approved for use per permit # 1824. All other conditions remain the same.
	Departr	ment: SGRP Contact: Steven Skrentay Ext/Pager 3536
В.		CONMENTAL REVIEW/EVALUATION onmental Affairs to Complete)
•	1.	Is an Environmental Screening required?   (If yes, attach screening to this review)  A Heached
	<ol> <li>3.</li> </ol>	Work requirements and restrictions  Sande Plastic Beals to ensure that wash is not dessited  as harachus - Contact env. durin process so a sample for  TCLP can be taken. No other restrictions aprly since it is Self-  Contained.  Potential permit or plan requirements/changes  Critical Dune/High Risk Erosion  Michigan Storm Water Construction Permit PIP Plan Storm water  Erosion (Berrien Co. Drain Comm)  Waste Storage Permit  Hazwoper NPDES  Air  Joint Army Corps of Engineer/MDEQ Permit for  Wetlands and Waterways
	4.	Additional comments:  \[ \begin{align*} \text{DO a bittional critical Danc erosion or Stormwater pormists \\ \text{are resince.} \text{NO modifications} \text{ of the property will take place.} \\ \text{Qll work will rote place in a Controlled building} \\ \text{Reviewer/Evaluator General Supervisor-} \text{Environmental Review} \\ \text{Date } \frac{5-4-00}{4-00} \\ \text{Date } \frac{5-5/00}{4-00} \\ \text{Date } Date

### ENVIRONMENTAL SCREENING FOR THE CONVERSION OF A SGRP LOWER ASSEMBLY STORAGE BUILDING INTO A DECONTAMINATION FACILITY

Pursuant to Technical Specifications Appendix B, Section 3.1, a review of the proposed activity is required to determine if the proposed activity has the potential for affecting the environment. A determination that the activity has the potential for significant adverse environmental impact would require an Environmental Evaluation. The Environmental review ensures compliance with local, state and federal environmental regulations pertaining to construction and related activities. Pursuant to 12 EA 6090 ENV.107, it is concluded that this activity does not adversely affect the environment.

#### DESCRIPTION OF PROPOSED ACTIVITY

A storage building originally intended to house the replacement steam generator lower assembly is to be converted into a decontamination facility. Equipment used in the SGRP will be decontaminated at this facility for unconditional release. The facility is a pre-fab steel walled warehouse. It is connected by doorway on both sides to other similar buildings. The side access doors will be boarded and nailed to prevent entry. The building will become a radiologically controlled area. The floor will be covered with herculite. Equipment will be brought in at one end to a staging area. (See attached layout) A PlasBlast self-contained glove box type plastic bead blast with attached recovery unit will be used. The enclosure is maintained at a negative pressure during operations and HEPA ventilation units are attached. There will be continuous air sampling and radiation protection coverage during operation of the PlasBlast plastic bead blasting unit. Effluent air samples will be taken inside the building's general area. All items that enter the controlled area as radioactive materials shall be surveyed and properly labeled prior to transport. Items entering the decontamination facility will be limited to < 25k dpm/100cm2 loose surface contamination and < 100 mRem/hr contact dose rate.

Equipment that is determined to be radioactive after two efforts will be properly labeled and disposition may include retention, storage, disposal or shipment as appropriate and in compliance with applicable AEP procedures.

#### ENVIRONMENTAL REVIEW/EVALUATION

The only applicable environmental regulations involve air emissions and spill control measures.

The PlasBlast unit is a self contained enclosure. Air emissions from the unit are filtered through a HEPA ventilation unit and will meet ambient air requirements. No visible emissions will escape from the blast unit or the building confines. There are no particulate air emission environmental concerns.

The plastic bead material will generate particulate waste. The waste is sorted by the PlasBlast unit. Some of the plastic bead material will be recycled and used in the plastic bead-blasting unit. The plastic bead material that cannot be recycled will be disposed of as radioactive waste. The plastic bead must be labeled in accordance with the plant's chemical control program.

The currently installed electric air compressor will be used to supply compressed air to the PlasBlast unit. A 10' x 12' diesel powered compressor utilizing about 30 gallons/day of diesel may be required to be used if the electric air compressor is unavailable. Since the fuel thru-put is less than 73.5 gal/hr, an air permit is not required. The horse power rating on the diesel engine is 115 HP, which is less than the 300 HP required to be tracked for purposes of the annual air emissions inventory. The compressor will be located outside of the warehouse building. A berm enclosure to encompass the compressor will be used to contain diesel spills. The berm capacity will contain 110% of the oil volume in the compressor.

Provided that the above conditions are met, the project is in compliance with air permitting, SPCC and PIP Plan requirements.

Plastek™ is fully approved for disposal by land burial and is SEG certified incinerable.

# PlasBlast

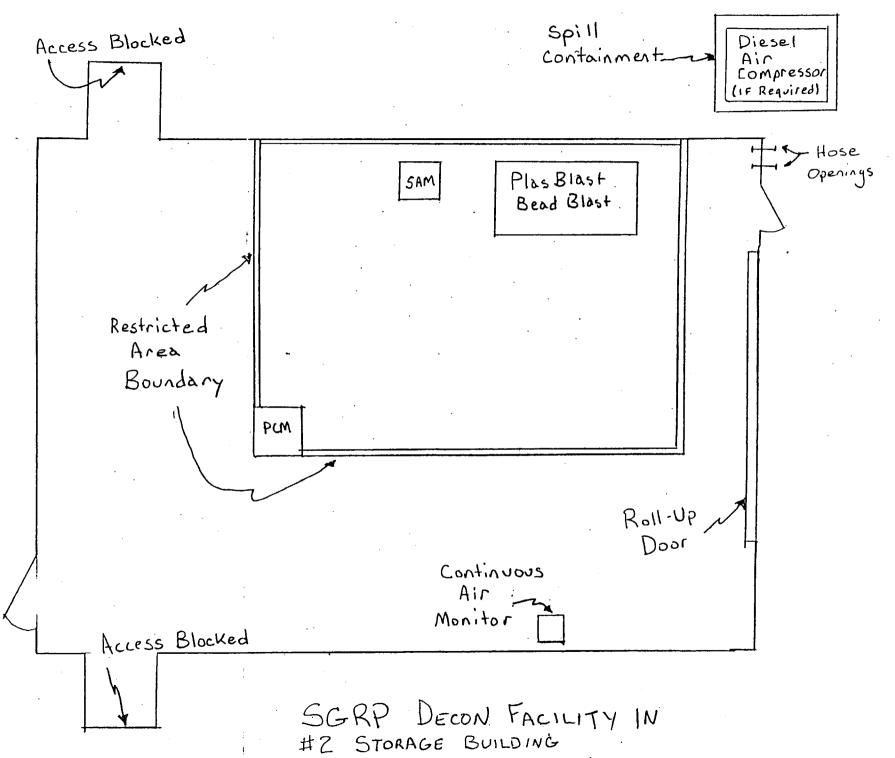
# The decontamination system with an incinerable medium.

The Bartlett PlasBlast<sup>TM</sup> decontamination system utilizes a high velocity stream of incinerable plastic particles (Plastek<sup>TM</sup>) to decontaminate most surfaces.

- • The PlasBlast™ system has a lower capital cost than CO<sub>2</sub>. •
  - • More aggressive medium than CO2. •
  - •• Plastek™ medium is recycled to reduce waste volume.••
    - • Self-cleaning prefilter housing. •
    - • Mobile or fixed installations available. •



Plymouth, MA 02362

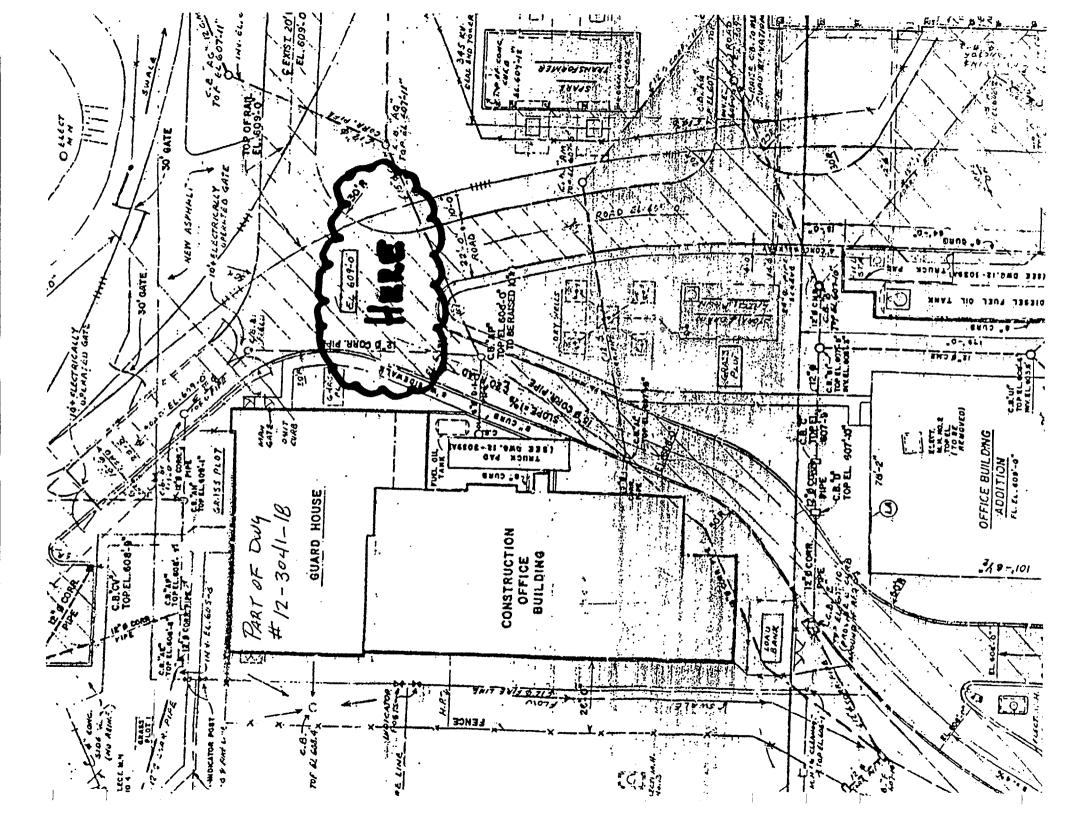


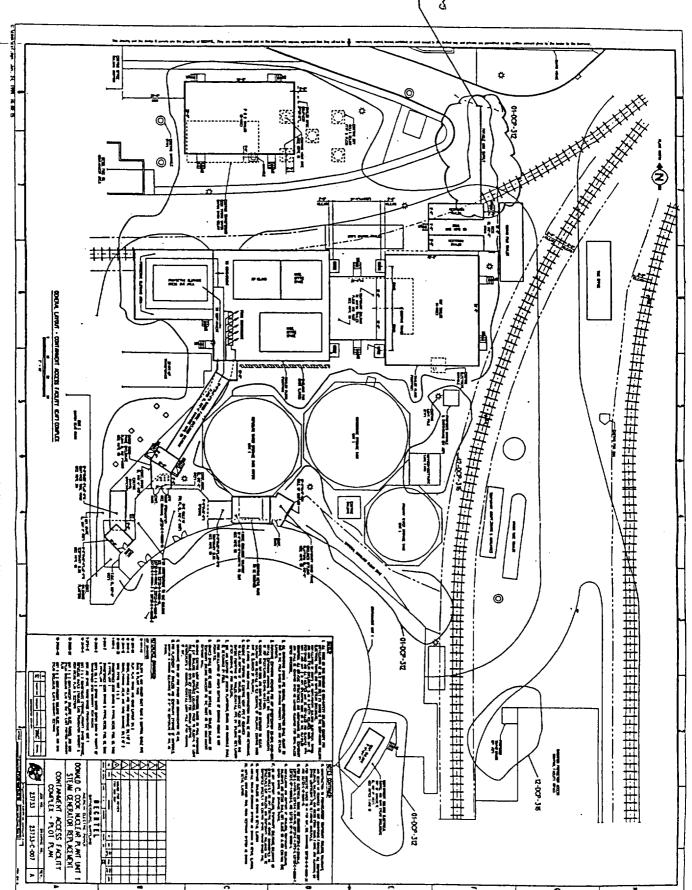
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Page 1 of 1 Revision 0

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Reviewer/Evaluator General Supervisor -

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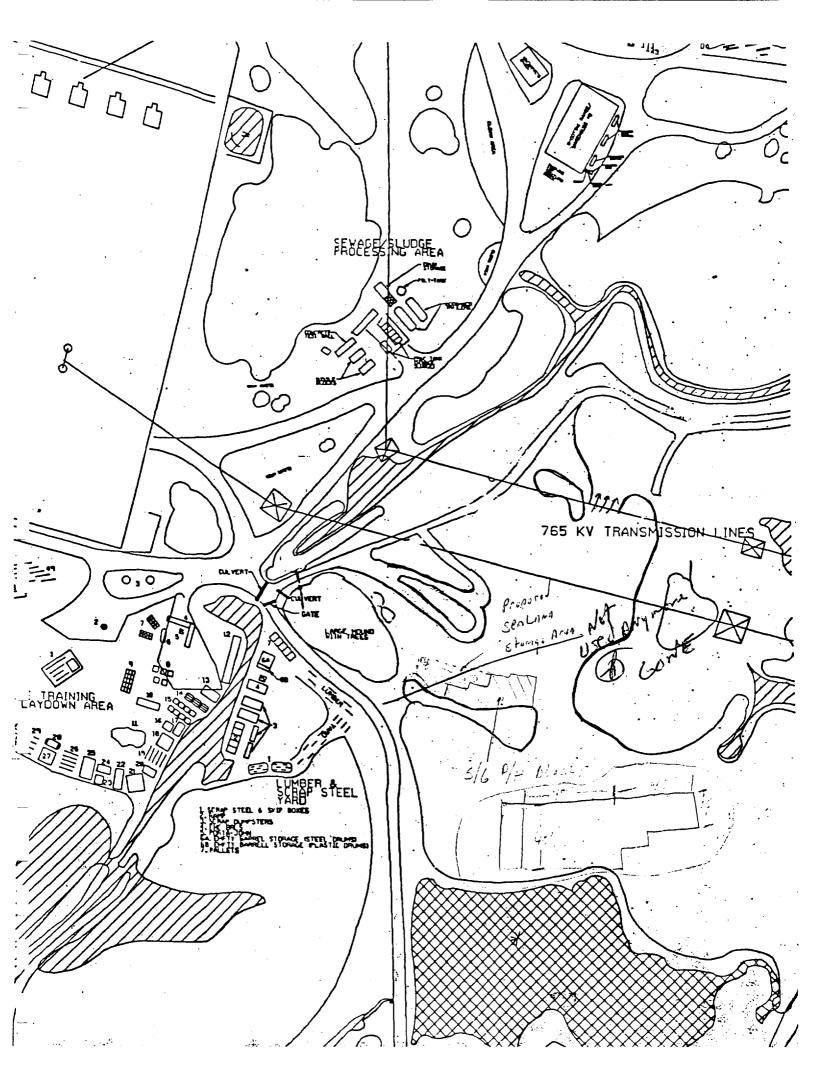
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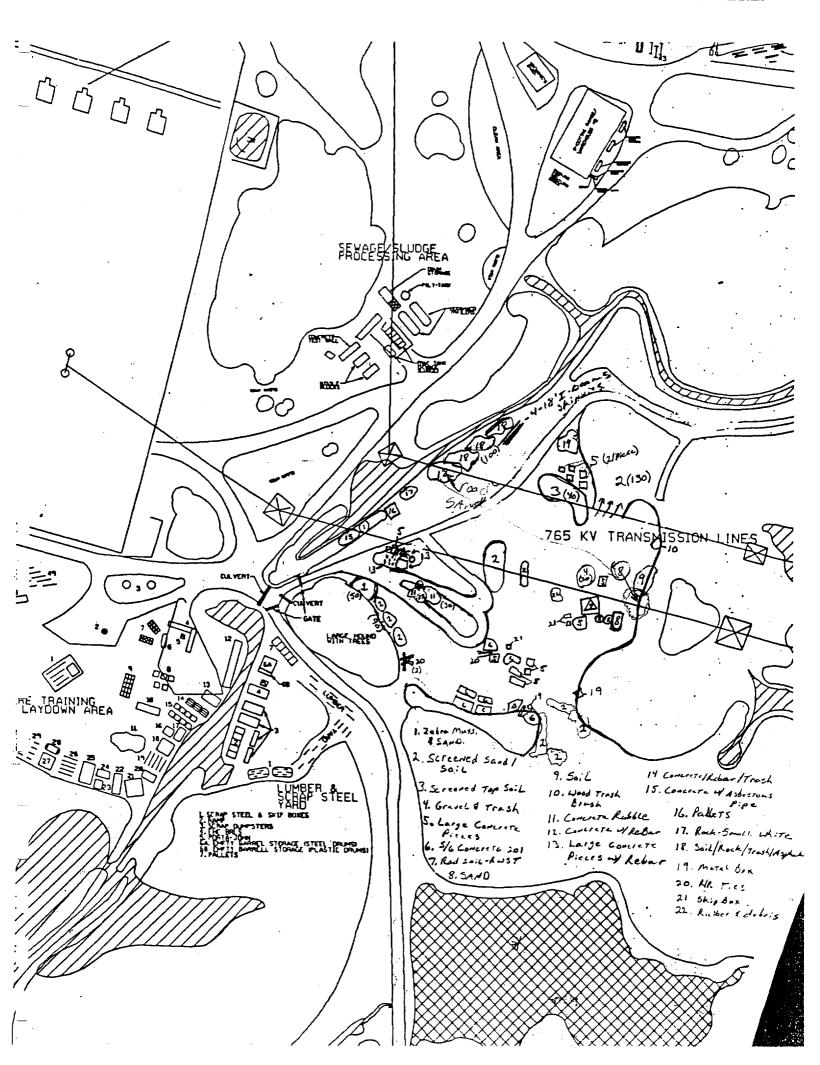
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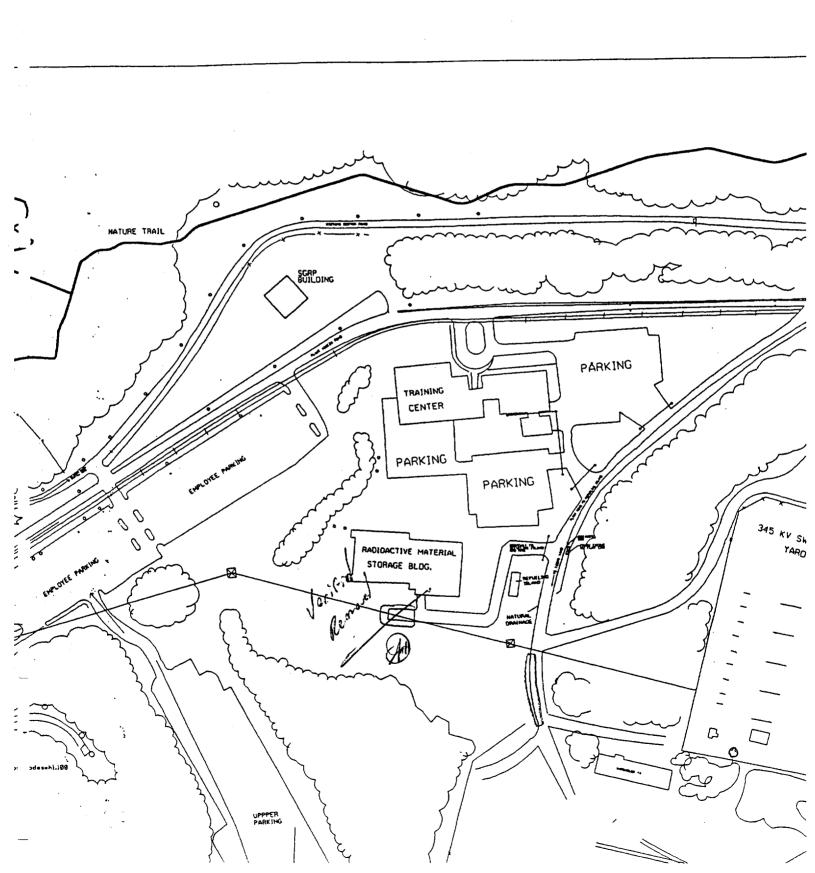
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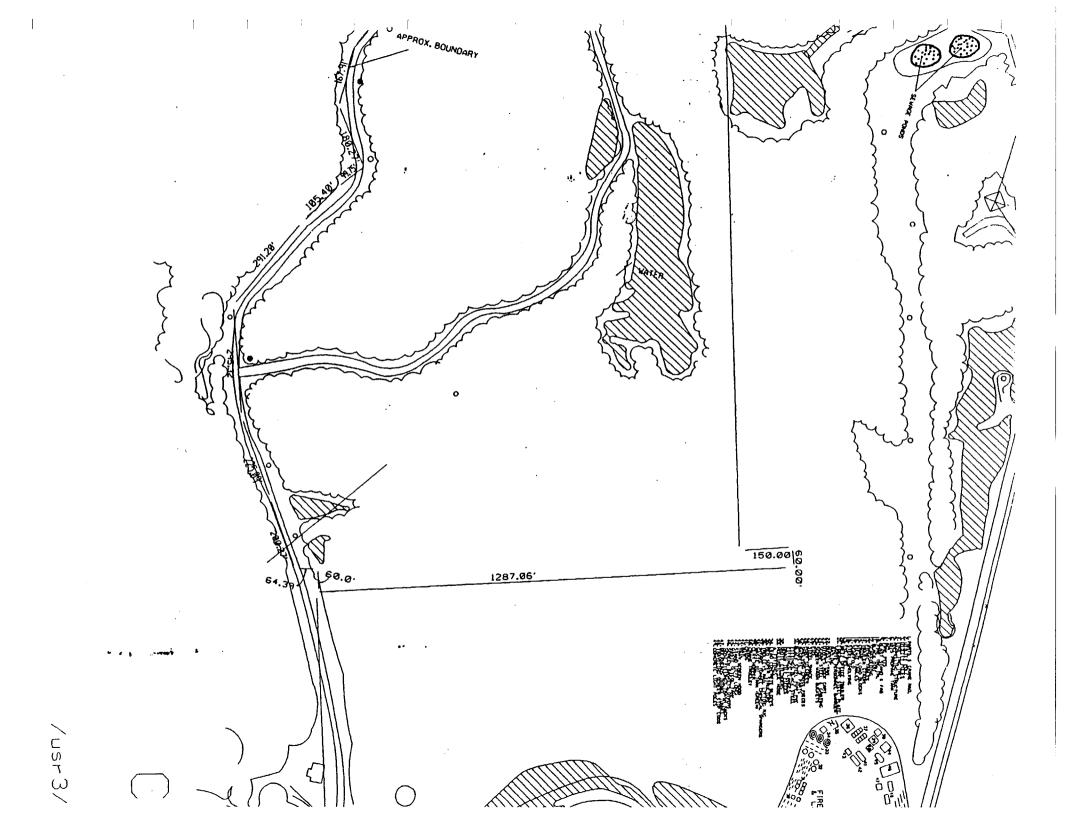


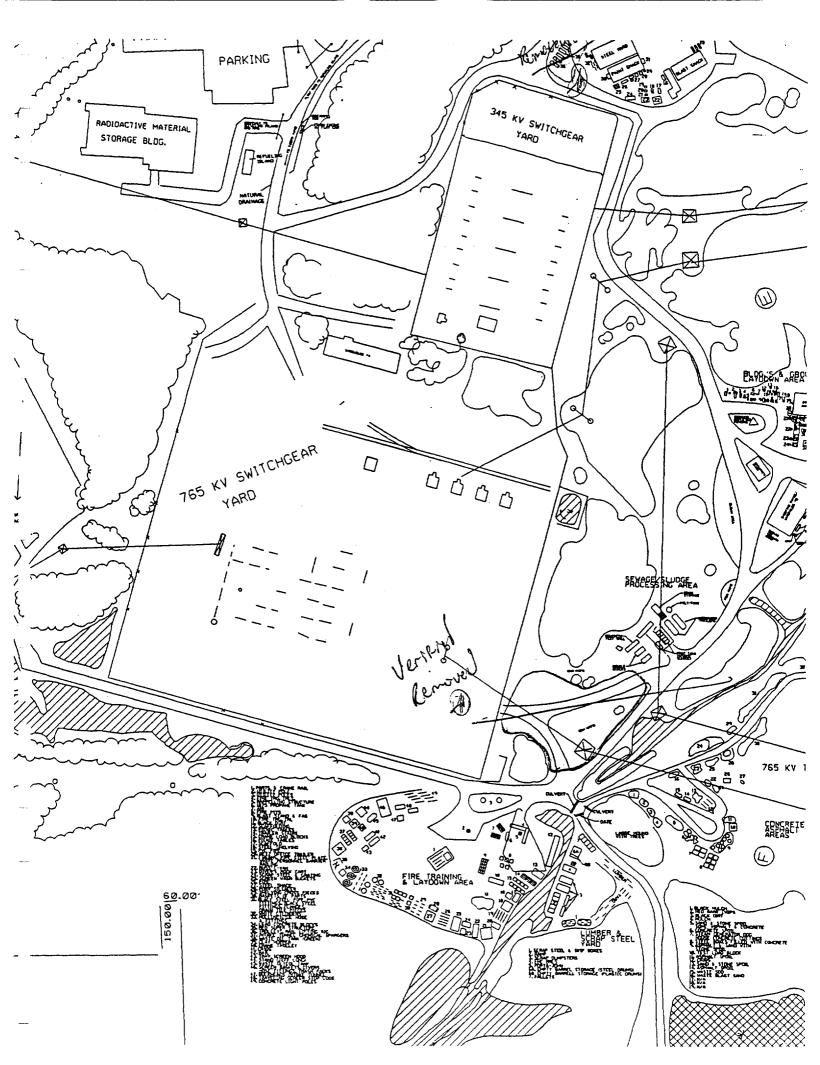




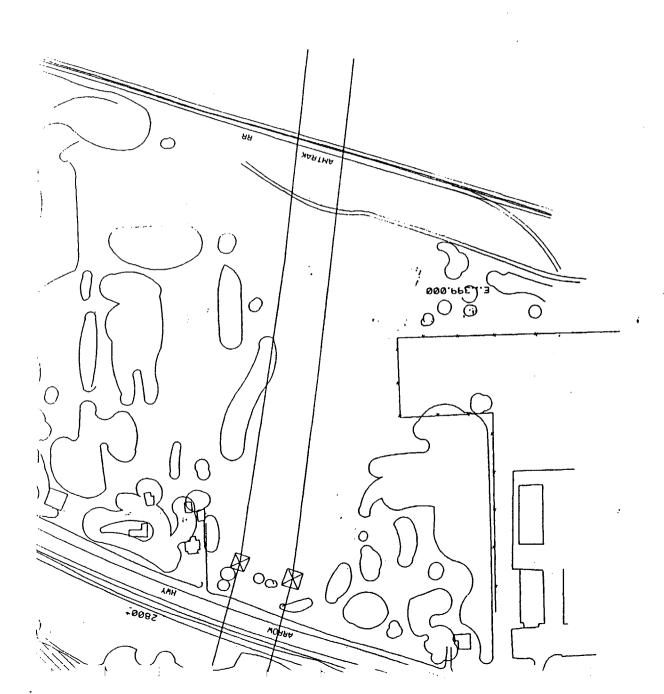


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APPENDIX III
HERBICIDE APPLICATION REPORT
2000



Date

January 31, 2001

Subject

2000 Herbicide Spray Report - Cook Nuclear Plant

From

Jon H. Harner

To

J. P. Carlson

The following herbicides were applied on Cook Nuclear Plant property during 2000:

Weed-B-Gone

Karmex DF with Hi-Lite Indicator Riverdale Solution Water Soluble IVM

Arboroil Tordon Oust

Round-Up Pro Garlon 4

Ax-it

DeAngelo Brothers

On the dates of May 2, 3, 4, and 11 a mixture of Karmex DF with indicator, Oust, and Riverdale Solution was used for total plant control in the 69KV, 345KV and 765 KV switch yards, railroad right-of-ways, around buildings, parking lots, and within the plant's protected area. DeAngelo Brothers; a Michigan licensed herbicide applicator (Jeff Callaway) on contract to the AEP Western Division performed the application. A total of 308 pounds of Karmex DF, 77 oz. of Oust, and 693 oz. (21.7 qts) of Riverdale Solution were used for the application and spread over 48 acres. Hi-Light Indicator, a marker dye, was used at a rate of 3 oz. per 80-gallon mix or less. The following table details the application rates used compared to the allowable application rates. The herbicides were applied according to the manufacturer's labeled instructions and according to Federal and State requirements.

Product Name	Quantity Used	Quantity Used/Acre	Quantity Allowed/Acre
Karmex DF	308 lb.	6.4 lb.	15 lb.
Oust	77 oz.	1.6 oz.	8 oz.
Riverdale Solution	693 oz.	14.4 oz.	45 oz.
Hi-Light Indicator	178 oz.	3 oz./80 gal. mix	9.6 oz./80 gal. mix

# Plant Buildings and Grounds

On the following dates, Round-Up Pro mixed with water in a backpack sprayer was used to spot spray weeds in the landscaped stone, 06/06/00, 07/26/00, 08/24/00, 8/25/00, and 10/31/00. The stone areas included, along the plant railroad tracks, the sewage ponds, and around the trailers, transformers, and U-1 refueling water storage tank in the protected area. A total of 90 ounces of Round-Up Pro was used for spot spraying in 2000. Weed-B-Gone was applied to the grassy areas in side the protected area on 08/23/00 and again on 09/21/00. During these applications a total of 11 ounces of Weed-B-Gone were used to spot treat weeds.

The applications were performed by a licensed applicator from the Maintenance Sunstates Buildings and Grounds crew, Pat O'Malley. As these applications were not broadcast, weeds were individually spot sprayed, product usage rates per acre are not reported for these applications. The herbicides were applied according to manufacturer's labeled instructions, Federal, and State requirements.

Product Name	Quantity Used	Quantity Used/Area	Quantity Allowed/Area
Weed-B-Gone	11oz.	Spot sprayed at 1.0 oz/gal	1.0 oz/gal for Spot spraying
Round-Up Pro	74 oz.	Spot sprayed at 2.0 oz/gal	2.0 oz/gal for Spot spraying

# AEP Transmission Personnel

On 06/08/2000, 06/27/00, and 08/23/00 the herbicide products listed below were applied to various stumps around the meteorological tower, under the 765kv transmission lines, and the crosstie area between the 34kv line to the 345kv switchyard. These applications were performed by licensed applicators of AEP (Earl Farrington, Greg Thompson, and John Trombley) and with oversight by a Plant Environmental Specialist. The herbicides were applied according to the manufacturer's labeled instructions and according to Federal and State requirements.

Product Name	Quantity Used	Quantity Used/Area	Quantity Allowed/Area
Tordon	0.5 gal	Applied to stumps – met tower (1.6 A).	2 gal/Acre
Garlon – 4/Arboroil	8 gal (25/75)	Applied to stumps – 765kv (4.5 A)	8 gal/Acre
Garlon – 4/Ax-it	1 pint -premix	Applied to stumps- 34kv/345kv (0.5A)	8 gal/Acre

# Mortality Inspection

Between October 23 and October 29, 2000, the mortality of these herbicide applications was assessed to be greater than 95% with a few specific exceptions by environmental technician Mr. Dean Warlin as per 12 PMP 2160 HER.001. There was no evidence of over-spray or spillage in any of the application areas. The results of the inspection were as follows:

- Along the railroad tracks East of Red Arrow Highway there is plant growth in the area of the first switch to the North of the CSX tracks on the AEP side for about 250 feet, also, the final 500 feet South before our tracks rejoin the CSX tracks.
- Grapevine growing along the railroad tracks at the switch off our main spur to the 765kV Yard.
- Scattered small aspens and two small bushes in the 765kV yard next to the Preferred Source #2 breaker bank.
- Plants coming up in the 345kV Yard at the entrance from the 765kV Yard, the SE corner and along the West side.

Areas untreated in 2000 but need treatment in 2001.

- The following areas (flower beds) showed a need for treatment:
  - 1. West of the RMB
  - 2. Around the N.E. fire door from the RMB
  - 3. South and East lawns of the Training Building
  - 4. South of the OBA.

### Summary

Based upon our review of the application records, manufacturer specifications, material safety data sheets (MSDSs) and observations of the treated areas, the herbicides were applied according to the manufacturer's labeled instructions and according to Federal and State requirements. As required by the State of Michigan all personnel performing herbicide applications were licensed. A map has been included with this report indicating areas of herbicide application. Detailed maps and application records are filed in 12 PMP 2160 HER.001, Guidelines for the Application of Approved Herbicides. No signs of over spray or spillage were observed or noted. No adverse environmental effects occurred.

Jon H. Harner - Environmental Specialist

