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INDIANA MICHIGAN POWER

June 28, 2001

C0601-05
10 CFR 50, Appendix R

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
REVISION TO COMMITMENT REGARDING EXEMPTION FROM
10 CFR 50, APPENDIX R, SECTION III.O REQUIREMENT FOR
THE REACTOR COOLANT PUMP OIL COLLECTION TANK SYSTEM
(TAC NOS. MA8183 AND MA8184)

References:

1. Letter from M. W. Rencheck (I&M) to Nuclear Regulatory Commission Document Control Desk, "Response to Request for Additional Information Regarding Reactor Coolant Pump Oil Collection Tank System (TAC Nos. MA8183 and MA8184)," C1000-06, dated October 6, 2000.

2. Letter from R. P. Powers (I&M) to Nuclear Regulatory Commission Document Control Desk, "Correction to Information Used to Grant Appendix R, III.O Exemption," C0200-07, dated February 29, 2000.

3. Letter from S. A. Varga (NRC) to J. Dolan (I&M), "Donald C. Cook Nuclear Power Plant, Unit Nos. 1 and 2 Fire Protection – Request for Exemption from Requirements of Appendix R to 10 CFR 50, Sections III.G and III.O," dated December 23, 1983.

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) of a revision to a commitment previously identified in Indiana Michigan Power Company's (I&M's) response to a request for additional information, transmitted by Reference 1. As discussed in Reference 1, I&M committed to de-energize the 480-volt alternating current (vac) welding transformer whenever the plant is in an operating mode that requires the reactor coolant pumps (RCP) to be operable (Modes 1 through 4). Because the 480-vac welding transformer provides power for all the welding circuits in containment, I&M is revising this

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commitment to allow energizing the 480-vac welding transformer to facilitate work in containment while the plant is in Modes 1 through 4.

In Reference 3, the NRC granted I&M's request for an exemption from the 10 CFR 50, Appendix R, Section III.O requirement that the RCP lubricating oil collection system be sized to contain oil from all potential leakage sites. In Reference 2, I&M identified several potential electrical ignition sources in the general area of the RCP lubricating oil collection tank. One of these potential ignition sources was the 480-vac welding transformer. Information regarding this potential electrical ignition source and its associated fire hazards was provided in Reference 1.

As discussed in Reference 1, I&M committed to and has implemented procedural controls to ensure that, prior to entry into Mode 4, the breaker to the 480-vac welding transformer is verified to be open, no electrical cords are plugged into the welding power outlets in lower containment, and the 120-vac and 480-vac receptacles are secured with all temporary extension cords removed and stored above floor level.

I&M has since recognized that there are certain times when it is necessary or highly desirable for the 480-vac welding transformer to be energized, such as emergency plant repairs or pre-outage work. Therefore, I&M is revising its previous commitment to de-energize the welding transformer when the RCPs are required operable. To preclude the welding transformer from becoming a potential ignition source, I&M will revise the appropriate plant procedures to include operator actions to de-energize the welding transformer circuit upon indication of a RCP lubricating oil system leak. No containment entry would be required to de-energize the transformer since the breaker to the transformer is located outside containment. These controls will provide adequate assurance that the welding transformer would not represent a potential ignition source if the oil collection tank were to overflow with the RCPs running.

The existing plant design and operational features of the RCP lubricating oil system ensure that adequate indication is available to the operators if an oil system leak was to occur. For example, control room alarms are provided for high oil collection tank level and low or high RCP bearing oil pot level. The oil collection tank is designed to hold approximately 275 gallons of oil with the high-level tank alarm setpoint at approximately 91 gallons. As such, if an oil leak was to occur while the welding transformer was energized, sufficient time would be available to the operators to allow the transformer to be de-energized before the tank overflows.

Additionally, it is unlikely that oil would contact the welding transformer. The 480-vac welding transformer is installed on a 6-inch concrete base located approximately 30 feet from the RCP lubricating oil collection tank. If the oil collection tank did overflow, any oil pooling would most likely begin in the immediate vicinity of the RCP lubricating oil collection tank due to the lack of significant lower containment floor slope. Assuming a total loss of all lube oil from the four RCPs and none of the overflow oil enters the containment sump, the oil would cover the lower level containment floor to a depth of approximately 3/8 inch. This depth is well below the height of the welding transformer's 6-inch concrete base. Also, because the collection tank is not pressurized, any oil that did overflow from the tank would not be sprayed.

Finally, the Donald C. Cook Nuclear Plant Unit 1 and Unit 2 Fire Hazards Analysis (FHA) for the lower containment fire zones already considers the effects of 1,060 gallons of RCP lubricating oil and the quantity of cable insulation in lower containment in determining fire loading. The FHA demonstrates that the plant can be safely shut down in accordance with the requirements of 10 CFR 50, Appendix R, in the event of a fire in the lower containment fire zone.

Based on the information above, I&M considers that the previous exemption to 10 CFR 50, Appendix R, Section III.O remains justified.

The attached summarizes the revised commitment made in this letter.

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

Sincerely,

Scot A. Greenlee
Director Design Engineering and Regulatory Affairs

/bjb
Attachment

c: J. E. Dyer
MDEQ – DW & RPD, w/o attachment
NRC Resident Inspector
R. Whale, w/o attachment

ATTACHMENT TO C0601-05

COMMITMENTS

The following table identifies those actions committed to by Indiana Michigan Power Company (I&M) in this submittal. Other actions discussed in the submittal represent intended or planned actions by I&M. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Date
I&M will revise the appropriate operating procedures to require immediate operator action to de-energize the containment welding transformer circuit, if energized, upon any indication of a potential reactor coolant pump lubricating oil system leak.	June 30, 2001