



January 11, 2002

AEP:NRC:2540
10 CFR 50.54(a)(4)

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2
QUALITY ASSURANCE PROGRAM DESCRIPTION
REDUCTION IN COMMITMENT

Pursuant to 10 CFR 50.54(a)(4), Indiana Michigan Power Company (I&M), the Licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, requests approval of a reduction in commitment to the CNP Quality Assurance Program Description (QAPD), Revision 16. The proposed change would revise Exception/Interpretation 11d to allow continued use of the Training Center File Rooms for the storage of quality assurance records. The proposed change to the exception/interpretation meets the requirements of Section 17.1.17.4, Alternative 3, to NUREG-0800, "Standard Review Plan for the Reviews of Safety Analysis Reports for Nuclear Power Plants," dated July 1981.

Attachment 1 describes I&M's current commitment, including background information, and a detailed discussion of the requested change. Attachment 2 provides the QAPD pages marked up to show the proposed changes. Attachment 3 provides the QAPD pages with the proposed changes incorporated.

In accordance with 10 CFR 50.54(a)(4)(iv), I&M will consider this reduction in commitment accepted unless notified otherwise by the NRC within 60 days of the date of this letter.

Q004

This letter contains no new commitments. Should you have any questions, please contact Mr. Gordon P. Arent, Manager of Regulatory Affairs, at (616) 697-5553.

Sincerely,



S. A. Greenlee
Director, Nuclear Technical Services

/dmb

Attachments

c: K. D. Curry
J. E. Dyer
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NRC Resident Inspector
R. Whale

ATTACHMENT 1 TO AEP:NRC:2540

CURRENT COMMITMENT, BACKGROUND INFORMATION, AND DETAILED
DISCUSSION OF THE REQUESTED CHANGE

CURRENT COMMITMENT

As required by Exception/Interpretation 11d in the Donald C. Cook Nuclear Plant (CNP) Quality Assurance Program Description (QAPD), CNP has committed to storing records in storage facilities that meet the requirements of Section 17.1.17.4, Alternative 3, to NUREG-0800, "Standard Review Plan for the Reviews of Safety Analysis Reports for Nuclear Power Plants," dated July 1981. NUREG-0800 requires records to be stored in a two-hour fire-rated resistant file room with the following provisions:

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.

BACKGROUND

In 1995, CNP identified that the file rooms in the Training Center were being used to store quality assurance records and did not comply with Section 17.1.17.4, Alternative 3, to NUREG-0800, "Standard Review Plan for the Reviews of Safety Analysis Reports for Nuclear Power Plants," dated July 1981, as required by the QAPD. Ten items of concern were identified. As a result, an engineering review of the Training Center File Rooms to NUREG-0800 requirements was performed. The engineering review identified ten recommendations to resolve the items of concern. Five of the engineering recommendations involved physical corrections to the file rooms, the remaining five recommendations would require a change to the QAPD for reduction in commitment. Subsequently, the physical changes to the Training Center File Rooms were completed, thereby resolving five of the ten concerns.

In 1999 it was noted that the previously identified changes to the QAPD had not been made. Subsequently, the previously performed engineering evaluation was re-verified.

An evaluation in February 2000 confirmed that the original evaluation was still valid. The evaluation noted that the original QAPD change request did not materialize because records management was to provide a dual storage approach by scanning records in the Training Center file rooms. Since that decision was made, the project slated to scan the records was cancelled and the records remained in the Training Center File Rooms.

DETAILED DISCUSSION OF CHANGES

The proposed change would revise Exception/Interpretation 11d to allow continued use of the Training Center File Rooms for the storage of quality assurance records. The proposed change to the exception/interpretation meets the requirements of Section 17.1.17.4, Alternative 3, to NUREG-0800, "Standard Review Plan for the Reviews of Safety Analysis Reports for Nuclear Power Plants," dated July 1981. The changes to the exception includes:

1. The floor slab is on grade; therefore, the two-hour fire rating is not applicable.
2. The present design of the ceiling assembly has a minimum of three inches of concrete on metal pan. This design provides approximately between 45 to 90 minutes of fire resistance. The level of risk associated with a fire penetrating through the ceiling is minimal since the walls are sealed to the ceiling and fire barrier seals were installed. A fire above the rooms would tend to burn both upward and outward from its origin, reducing the impact of a fire burning down through the ceiling of concern. The rooms and surrounding areas are also protected by automatic wet pipe sprinkler systems, which would control or extinguish a fire until arrival of the fire brigade.
3. The presence of the light switch within the wall has a minimal impact on the overall fire rating. The noncombustible nature of the block will also prevent the spread of fire should a short or fire develop at the switch.
4. The pipe penetrations through the fire rated walls were sealed. The fire protection and service water pipes located in the facilities overhead do not have any affect on the fire rating; however, the potential hazard is if a pipe is ruptured, records could suffer water damage.
5. The PVC pipe penetrations were sealed. The level of risk associated with a fire penetrating through the sealed PVC piping is minimal. A fire above the rooms would tend to burn both upward and outward from its origin, reducing the impact of a fire burning down through the ceiling of concern. The rooms and surrounding areas are also protected by automatic wet pipe sprinkler systems, which would control or extinguish a fire until arrival of the fire brigade.

The continued use of Training Center File Rooms for storage of quality assurance records is based on the risk-informed information below:

1. The fire protection system consists of a two-stage activation system.
2. The fire protection system is electronically monitored at a 24-hour security station that ensures prompt response in the event of a fire.
3. The file room walls are interior to the building and are not subject to weather and other adverse conditions.
4. The additional provisions in NUREG-0800 are stated as recommendations (i.e., "should's").
5. Access to these rooms is controlled and only activities pertaining to the file rooms are performed therein.

ATTACHMENT 2 TO AEP:NRC:2540

QAPD PAGES
MARKED TO SHOW PROPOSED CHANGE

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Quality Assurance Program Description

11b. Sec. 5.4, Item 2

Requirement

“Records shall not be stored loosely. They shall be firmly attached in binders or placed in folders or envelopes for storage on shelving in containers. Steel file cabinets are preferred.”

Exception/Interpretation

Records are suitably stored in steel file cabinets, or on shelving in containers. Methods other than binders, folders, or envelopes (for example, dividers) may be used to organize the records for storage.

11c. Sec. 6.2

Requirement

“A list shall be maintained designating those personnel who shall have access to the files.”

Exception/Interpretation

Rules are established governing access to and control of files as provided for in ANSI N45.2.9, Section 5.3, Item 5. These rules do not always include a requirement for a list of personnel who are authorized access. It should be noted that duplicate files and/or microforms may exist for general use.

11d. Sec. 5.6

Requirement

When a single records storage facility is maintained, at least the following features should be considered in its construction: etc.

Exception/Interpretation

The Cook Nuclear Plant Master File Room and Training Center File Rooms comply with the requirements of NUREG-0800 (7/81), Section 17.1.17.4, option 3 with the following exceptions for the Training Center File Rooms:

1. The floor slab is on grade; therefore, the two-hour fire rating is not applicable.
2. The present design of the ceiling assembly has a minimum of three inches of concrete on metal pan. This design provides approximately between 45 to 90 minutes of fire resistance. The level of risk associated with a fire penetrating through the ceiling is minimal since the walls are sealed to the ceiling and fire barrier seals were installed. A fire above the rooms would tend to burn both upward and outward from its origin, reducing the impact of a fire burning down through the ceiling of concern. The rooms and surrounding areas are also protected by automatic wet pipe sprinkler systems, which would control or extinguish a fire until arrival of the fire brigade.

Quality Assurance Program Description

3. The presence of the light switch within the wall has a minimal impact on the overall fire rating. The noncombustible nature of the block will also prevent the spread of fire should a short or fire develop at the switch.
4. The pipe penetrations through the fire rated walls were sealed. The fire protection and service water pipes located in the facilities overhead do not have any affect on the fire rating; however, the potential hazard is if a pipe is ruptured, records could suffer water damage.
5. The PVC pipe penetrations were sealed. The level of risk associated with a fire penetrating through the sealed PVC piping is minimal. A fire above the rooms would tend to burn both upward and outward from its origin, reducing the impact of a fire burning down through the ceiling of concern. The rooms and surrounding areas are also protected by automatic wet pipe sprinkler systems, which would control or extinguish a fire until arrival of the fire brigade.

11e. Sec. 5.6

Requirement

Section 5.6 requires the record storage facilities to have a four-hour fire rating.

Exception/Interpretation

In lieu of this requirement, the minimum two-hour rating as specified in ANSI N45.2.9-1979 is an acceptable alternative.

ATTACHMENT 3 TO AEP:NRC:2540

PROPOSED QAPD
REVISED PAGES

Page 48

Page 48a

Quality Assurance Program Description

11b. Sec. 5.4, Item 2

Requirement

"Records shall not be stored loosely. They shall be firmly attached in binders or placed in folders or envelopes for storage on shelving in containers. Steel file cabinets are preferred."

Exception/Interpretation

Records are suitably stored in steel file cabinets, or on shelving in containers. Methods other than binders, folders, or envelopes (for example, dividers) may be used to organize the records for storage.

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"A list shall be maintained designating those personnel who shall have access to the files."

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Rules are established governing access to and control of files as provided for in ANSI N45.2.9, Section 5.3, Item 5. These rules do not always include a requirement for a list of personnel who are authorized access. It should be noted that duplicate files and/or microforms may exist for general use.

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Exception/Interpretation

The Cook Nuclear Plant Master File Room and Training Center File Rooms comply with the requirements of NUREG-0800 (7/81), Section 17.1.17.4, option 3 with the following exceptions for the Training Center File Rooms:

1. The floor slab is on grade; therefore, the two-hour fire rating is not applicable.
2. The present design of the ceiling assembly has a minimum of three inches of concrete on metal pan. This design provides approximately between 45 to 90 minutes of fire resistance. The level of risk associated with a fire penetrating through the ceiling is minimal since the walls are sealed to the ceiling and fire barrier seals were installed. A fire above the rooms would tend to burn both upward and outward from its origin, reducing the impact of a fire burning down through the ceiling of concern. The rooms and surrounding areas are also protected by automatic wet pipe sprinkler systems, which would control or extinguish a fire until arrival of the fire brigade.

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3. The presence of the light switch within the wall has a minimal impact on the overall fire rating. The noncombustible nature of the block will also prevent the spread of fire should a short or fire develop at the switch.
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