

June 24, 1993

Docket Nos. 50-315
50-316

Mr. E. E. Fitzpatrick, Vice President
Indiana Michigan Power Company
c/o American Electric Power
Service Corporation
1 Riverside Plaza
Columbus, Ohio 43216

Dear Mr. Fitzpatrick:

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT
IMPACT - EXEMPTION FROM REQUIREMENT OF 10 CFR 50, APPENDIX J,
III.D.2 (FOR AIR LOCK LEAK TESTING - DONALD C. COOK NUCLEAR PLANT,
UNITS 1 AND 2 (TAC NOS. M85271 AND M85272)

Enclosed is a copy of the Environmental Assessment and Finding of No
Significant Impact concerning your request, dated December 21, 1992, for
exemption from the requirement in Appendix J, III.D.2(b)(ii) of 10 CFR
Part 50. The assessment has been forwarded to the Office of the Federal
Register for publication.

Sincerely,

Original Signed By:

Beth A. Wetzel, Acting Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc w/enclosures:
See next page

*See Previous Concurrence

OFFICE	LA:PD31	PE:PD31	(A)PM:PD31	(A)PD:PD31	*OGC
NAME	CJamerson	SLee	BWetzel	JHall	EHoller
DATE	6/23/93	6/24/93	6/24/93	6/24/93	6/9/93

OFFICIAL RECORD COPY

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script that reads "Beth A. Wetzel".

Beth A. Wetzel, Acting Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc w/enclosures:
See next page

Mr. E. E. Fitzpatrick
Indiana Michigan Power Company

Donald C. Cook Nuclear Plant

cc:

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Nuclear Facilities and Environmental
Monitoring Section Office
Division of Radiological Health
Department of Public Health
3423 N. Logan Street
P. O. Box 30195
Lansing, Michigan 48909

DISTRIBUTION

Docket File
NRC & Local PDRs
PDIII-1 Reading
D.C. Cook Plant File
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S. Lee
OGC-WF
E. Jordan
ACRS (10)
OPA
W. Shafer, R-III
A. DeAgazio, 14/C/7

cc: Plant Service list

UNITED STATES NUCLEAR REGULATORY COMMISSION
INDIANA MICHIGAN POWER COMPANY
DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-315 AND 50-316
ENVIRONMENTAL ASSESSMENT AND FINDING OF
NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an Exemption from the requirement of 10 CFR Part 50, Appendix J, Paragraph III.D.2(b)(ii) to Indiana Michigan Power Company (the licensee), for operation of the Donald C. Cook Nuclear Plant, Units 1 and 2, located in Berrien County, Michigan.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action:

The proposed action would grant an exemption from the requirement of Appendix J, Paragraph III.D.2(b)(ii) of 10 CFR Part 50. On December 21, 1992, the licensee requested an exemption from paragraph III.D.2(b)(ii) which requires that a full pressure air lock leakage test be performed whenever air locks are opened during periods when containment integrity is not required by the plant's Technical Specifications. Instead of the full pressure air lock leakage test, the licensee has proposed to conduct seal leakage testing when the reactor is in cold shutdown or refueling and maintenance has been performed on the air lock gaskets, but no maintenance has been performed that affects air lock sealing capabilities.

The Need for the Proposed Action:

The proposed exemption is needed because compliance to Paragraph III.D.2(b)(ii) of 10 CFR Part 50, Appendix J, would result in unique hardship and cost because of reduced operational flexibility and unwarranted delays in power ascension over the life of Cook Nuclear Plant. This requirement would be in excess of those incurred by other, similar facilities that have received exemptions from the subject Appendix J requirement. Performance of the leakage rate tests required by paragraph III.D.2(b)(ii) takes approximately eight hours per air lock and requires installation of strongback devices on both the inner and outer doors. Due to common problems that occur following maintenance during refueling shutdowns, it is often the case that this testing must be performed several times during the startup phase. This has in the past delayed entry into Mode 4.

Environmental Impact of the Proposed Action

The proposed exemption would allow the substitution of an air lock seal test for an air lock pressure test while the reactor is in Mode 5 (cold shutdown) or Mode 6 (refueling). The potential increase in risk to public health and safety is solely related to the potential increased probability for, and magnitude of, containment leakage during an accident that could lead to potentially greater offsite radiological consequences. The potential increase in risk due to this exemption is considered insignificant and would result only from the potential leakage path through the door operator shaft seals, which will not be measured by this substitute test. However, the six-month test requirement of Appendix J paragraph III.D.2(b)(i), and the testing required when maintenance is performed on the air lock, will measure the

leakage through the door operator shaft seals and provide assurance that the air lock will not leak excessively and will not affect containment integrity or increase the risk of any facility accidents. Therefore, post-accident radiological releases will not exceed previously determined values. The exemption has no impact on plant radiological or non-radiological effluents and has the potential to reduce occupational exposure by reducing the amount of time that personnel spend in a radiologically restricted area.

With regard to potential non-radiological impacts, the proposed change to the Technical Specifications involves a change in the installation or use of a facility component located within the restricted area as defined by 10 CFR Part 20. It does not affect non-radiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant non-radiological environmental impacts associated with the proposed amendment.

Alternative to the Proposed Action

Since the Commission concluded that there are no significant environmental effects that would result from the proposed action, any alternatives with equal or greater environmental impacts need not be evaluated.

The principal alternative would be to deny the requested amendment. This would not reduce environmental impacts of plant operation and would result in reduced operational flexibility.

Alternative Use of Resources

This action does not involve the use of resources not previously considered in connection with the Commission's Final Environmental Statement, dated August 1973, in connection with D. C. Cook, Units 1 and 2.

Agencies and Persons Consulted

The staff consulted with the State of Michigan regarding the environmental impact of the proposed action.

FINDING OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the foregoing environmental assessment, the staff concludes that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this proposed action, see the licensee's letter dated December 21, 1992. These letters are available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W. Washington, DC 20555 and at the local public document room located at the Maude Preston Palenske Memorial Library, 500 Market Street, St. Joseph, Michigan 49085.

Dated at Rockville, Maryland, this 24th day of June 1993.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script that reads "J. Randall Hall".

J. Randall Hall, Acting Director
Project Directorate III-1
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation