

Certified By C. McCormick

# INDIANA & MICHIGAN ELECTRIC COMPANY

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NEW YORK, N. Y. 10004

March 30, 1982  
AEP:NRC:0428B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
FIRE PROTECTION RULE - 10 CFR.50, APPENDIX R

Mr. James G. Keppler, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

PRINCIPAL STAFF			
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Dear Mr. Keppler:

In anticipation of the Special Team Inspection to verify compliance of the D. C. Cook Nuclear Plant with the requirements of Appendix R, we have been closely examining those requirements. During the past few weeks we have also commenced the development of the information you have requested in preparation for that inspection. As a consequence of these activities, we now have reason to question our previous understanding of certain provisions of Appendix R.

On March 27, 1981, we wrote to Mr. Harold Denton a response (AEP:NRC:0428A) to Mr. Darrell Eisenhut's generic letter of November 24, 1980, concerning the implementation of certain sections of Appendix R to 10 C.F.R., Part 50. A copy of that letter is attached. That letter included an Attachment describing in detail the fire protection facilities and procedures already installed at the Cook Plant which had been reviewed by the NRC. When we wrote the March 27, 1981, letter, we believed that the fire protection system was capable not only of safely shutting down either unit of the D. C. Cook Nuclear Plant under various emergency conditions, but also met the requirements of Appendix R. This was reflected in the detailed discussion in the Attachment to our March 27, 1981, letter which indicated that we met the intent of Appendix R. We have not had any response from Mr. Denton's staff taking issue with the discussion in our March 27, 1981, letter.

This conclusion was consistent with the NRC staff's observation in the Safety Evaluation Report issued earlier, on July 31, 1979. It said:

"Our conclusion is that a fire occurring in any area of the

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D. C. Cook Nuclear Plant will not prevent either unit from being brought to a controlled safe shutdown, and further that such a fire would not cause the release of significant amounts of radiation". This reflected the fact that the D. C. Cook Plant was one of few Plants that had installed an emergency shutdown system.


The March 27, 1981, response addressed three items of Appendix R: III.G-Emergency Protection of Safe Shutdown Capability Systems, III.J-Emergency Lighting, and III.O-Oil Collection Systems for Reactor Coolant Pumps. While the requirements of Appendix R are not easy to understand, our latest study suggests that while we fully meet III.J and III.O, there is some question concerning our conforming with a literal interpretation of Item III.G.

Our alternate shutdown and cooldown procedures, as described in our March 27, 1981, letter, have been demonstrated to respond in the event of loss of normal control capability. However, Section III.G of Appendix R could be interpreted to mean that our shutdown procedure must be capable of performing in the event of a fire in any location of the Plant, regardless of whether fire detection and suppression systems have been installed. Our shutdown procedure was not designed to cover this interpretation. Determination of whether the procedure as presently configured is adequate must await the results we are now compiling in response to your request.

We are proceeding to compile the lists of plant fire areas containing cables of redundant safety systems that are required for safe shutdown of the plant, as you requested. This list will permit us to evaluate the extended capability of our safe shutdown procedure. We will then be in a position to know whether and what additional steps, if any, would be required to meet our current understanding of Section III.G of Appendix R. We plan to keep you informed of the results of this evaluation. We currently estimate that it may take up to six months to complete our evaluation. We will provide you within twenty days with a detailed schedule to complete this work. You may wish to plan the Special Team Inspection to take this matter into account.

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,



R. S. Hunter  
Vice President

cc: John E. Dolan - Columbus  
R. W. Jurgensen  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Charnoff  
Joe Williams, Jr.  
NRC Resident Inspector at Cook Plant - Bridgman