INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

March 25, 1985

AEP:NRC:0499A

Donald C. Cook Nuclear Plant
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE Bulletin No. 80-24
PREVENTION OF DAMAGE DUE TO WATER LEAKAGE INSIDE CONTAINMENT

Mr. James G. Keppler, Regional Director
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region III
Glen Ellyn, IL 60137

Dear Mr. Keppler:

In a follow-up verbal response to IE Bulletin No. 80-24 we committed to a periodic visual inspection of the containment pipe tunnel sump. After a review of the installed equipment and its proven reliability, and in view of ALARA and safety concerns we believe that the visual inspection is not necessary and should be discontinued.

The attachment to this letter supports the request for the retraction of this commitment. With your concurrence, the retraction of this commitment will be made effective May 1, 1985.

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,

M. P. Alexich
Vice President

3/26/85

cm

Attachment
cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

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Attachment to AEP:NRC:0499A

I. In December of 1980 the D. C. Cook Plant received IE Bulletin #80-24 regarding prevention of damage due to water leakage inside containment.

The bulletin addressed several actions to be taken by the Plant. Item 2 of the bulletin concerned the adequacy of plant components to promptly alert Control Room Operators of a significant accumulation of water in containment as well as the ability to remove the water from containment.

In January of 1981 the company responded to IE Bulletin #80-24 in AEP:NRC:0499. In this response we relied upon the redundancy of our level indication, level alarms and pump run indication to alert the Operators of possible water leakage problems in the containments.

In March of 1981, we verbally committed to institute a periodic visual inspection of the containment pipe tunnel sumps.

II. In retrospect it appears that the response in AEP:NRC:0499 adequately addressed the concerns of IE Bulletin #80-24, and in view of ALARA and safety concerns, we believe the visual inspection of the pipe tunnel sump should be discontinued. The following is given in support of this retraction:

1. The pipe tunnel sump has two sump pumps with independent power supplies and auto-start circuitry.

2. Each pump has an abnormal-condition alarm that sounds if the sump has not been pumped down within two minutes of the pump start.

3. The pipe tunnel sump has a high level alarm.

4. A chart recorder provides a written record of sump pump run times.

5. In the unlikely event that both of the sump pumps and the alarms failed, excess water in the pipe tunnel would overflow into the lower-containment sump, which has a pump and alarm set-up that is similar to the pipe tunnel sump. In addition, the lower-containment sump is connected with the recirculation sump which also has level indication.

6. The pipe tunnel sump pumps and their associated alarms are demonstrated operable during each refueling outage, with no major problems being found thus far.

As shown above, there currently exists adequate means to determine if there is water accumulation in the pipe tunnel sump without a visual inspection. Therefore, by eliminating this surveillance, which requires the operator to enter containment at power, we can reduce the operators' occupational exposure and meet the ALARA principle.

Another problem with the surveillance is operator safety. In order to enter the lower containment at power an operator normally must wear a Scott air pack. The operator then goes through a small hatch and down a ladder while holding the air bottle over his head to get to the pipe tunnel (because both the person and the air bottle will not fit through the hatch at the same time). Therefore, elimination of this surveillance would also eliminate this safety concern.