June 7, 1995

Doris:

Please enter the attached document into NUDOCS, including PUBLIC. It is an original fax from Indiana Michigan Power Company.providing additional information on an earlier letter on a fire alarm system reflash commitment (TAC NOS. M90757 AND M90758)

Date: May 4, 1995

Facility: DONALD C. COOK NUCLEAR PLANT, UNIT NOS. 1 AND 2

Docket Nos.: 50-315 and 50-315.6

Recipient: John B. Hickman/NRC/NRR/DRPW/PD3-1

Author: John Girgis, American Electric Power

Original Incoming: August 24, 1994

cc: J. Hickman Cook File

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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

Office of Nuclear Reactor Regulation (NRR) Contact: Doris J. Hoover, DLO 415-1869, OWFN 12 H 13, Mail Stop O-12 H-5

DC: 95-156

DATE: June 7, 1995

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DONALD C. COOK NUCLEAR PLANT, 1 & 2 50-315 & 316 TAC Nos. M90757 & M90758

Attachments: As stated

CC: C. Jamerson J. Hickman

160011

Doris J. Hoover NRR Document Liaison Officer

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American Electric Power Service Corporation

1 Riverside Plaza Columbus, Ohio 43215

(614) 223-1000 Fax (614) 223-4000



AMERICAN ELECTRIC POWER

DATE:	
TIME:	
TO: JOHN HICKMAN	
Company:	
FAX NUMBER:	

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FROM: SOHN GIRGIS				
COMPANY:				
TELEPEONE NUMBER:				
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IF YOU HAVE ANY PROBLEMS WITH THIS FAX MESSAGE CONTACT THE PERSON NAMED ABOVE.				
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COOK NUCLEAR PLANT UNIT 142



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Conald C. Cook Nuclear Plant Unit Nos. 1 and 2 Docket: Nos. 50-315 and 50-316 DPP No. 58 and CPPR No. 61.

Mr. Edson G. Case, Acting Director Office of Nuclear Reactor Regulation U.S. Muclear Regulatory Commission Mashington, D.C. 20555.

Dear Mr. Case:

This letter is in response to Mr. Karl Kniel's letter, dated July 11, 1977, which transmitted to us 53 questions/positions concerning fire protection at the Donald C. Cook Nuclear Plant. Enclosed with this letter are five (5) sets of responses to all your fire protection questions except nos. 1,3,11,18,24,30,37, 38,40,46,49, and 52. The responses to these will be provided by September 30, 1977. By our letter dated July 20, 1977, we resubmitted proposed Technical Specifications for fire protection systems for both Units 1 and 2 of the Cook Nuclear Plant.

Due to the large amount of work required to respond to the fire protection questions, we do not have a schedule available for the implementation of the improvements to our fire protection program which are proposed in our submittals of January 31, 1977 . and March 31, 1977, and our responses to some of the NRC positions that were included in the fire protection questions. Requests for design changes are being prepared to implement all of these proposed improvements. Subsequent to approval of the requests for design changes, a schedule for implementation will be established and forwarded to the Commission. A description of facility modifications required to implement the positions will accompany the schedule. It should be noted that most of these

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Question 16:

- a. Provide the results of system tests or analyses which substantiates that the sensitivity of fire detection devices, and that the number and placement of detectors are sufficient to provide a prompt alarm and/or actuation of the automatic fire protection systems.
- b. Show that the complete fire alarm system, including waterflow and valve supervision, conforms to applicable guidance in NFPA 72D.
- c. Describe the detector system circuitry (from the detectors to the main control room fire panel). Supplement this description with selected elementary wiring drawings and typical cable routing diagrams. Also, provide an electrical single line diagram which shows the main source and if applicable the alternate source of power for these-systems.
- d. Identify any significant differences between the Unit 1 fire detection system and the Unit 2 fire detection system.

<u>Response to Question 16a:</u>

Each ionization detector in Unit 1 was checked for proper sensitivity, following installation, by I&M relay engineers and a technical representative of the supplier. This latter check also included cleaning and verification of operation of each detector. This will be done on Unit 2 once the installation is complete.

Following the check by the supplier, ionization detectors are cleaned twice yearly and checked for sensitivity and operation yearly by IAM personnel who have attended Fyralarm service courses and are qualified by Fyralarm to service such systems. Manufacturer technicians may be called in for assistance at any time, if required.

Thermistor detection systems in Unit 1 were checked for proper sensitivity and operation, following installation, by I&M relay engineers. This will also be done on Unit 2 once installation is complete. Following the above initial check, yearly operational checks are performed by I&M personnel who are thoroughly familiar with the equipment. Manufacturer technicians may be called in for assistance at any time, if required.

Ionization and thermistor detectors have been located by the supplier's engineers, in quantities and spacing to agree as a minimum with NFPA 72E and the UL listing for these devices. We rely, as do other utilities and industries, on the results of UL and/or FM testing to determine the effectiveness of a device or system, the parameters affecting its use, and the quantities to be used.

Response to Question 160:

REPSC NGD

We feel that NFPA 72D is an extremely poor guide to be used for nuclear power plants since it is much too general in nature. However, we recognize that it is, at this time, the only guidance available.

We also note that this question has apparently expanded in scope to include waterflow and valve supervision, whereas Appendix A to B.T.F. APCSE 9.5-1 only referred to NFFA 72D in Item E.1.(a) for fire detection. In responding to Appendix A to B.T.P. APCSE 9.5-1 we compared the requirements of NFFA 72D to the fire detection/suppression system control at the Cook Nuclear Plant. As stated therein we are in agreement with all the applicable portions of NFFA 72D except for the testing frequency.

Response to Question 16c:

The detector system circuitry is described below for the two types of fire detection in use at the Cook Nuclear Plant.

(i) Ionization (product of combustion) Fire Detection: ...

The ionization detector utilizes the principle wherein air is made electrically conductive (ionized) by exposure to a minute source of alpha radiation emitting material, Americium 241. The ionizing material is located in the outer or detecting chamber of the detector which is open to the atmosphere, and in an inner or compensating chamber of the detector which, except for a small vent to compensate for temperature and pressure changes, is essentially closed to prevent entrance of combustion products. The outer and inner chambers are connected in parallel with the anode and cathode of a special gas discharge (cold cathode) tube. The junction between the outer and inner chambers is connected to a starter electrode of the cold cathode tube.

A voltage is applied across the outer and inner ionization chambers causing a minute electrical current flow. When products of combustion enter the exposed outer chamber, the resistance to current flow increases and the voltage between the cold cathode tube starter electrode and the cathode increases and fires the tube. The current which then passes between the anode and cathode of the tube is sufficient to energize a zone relay and a corresponding alarm relay in the main ionization control unit.

The zone relay is a special 3-position relay incorporated in the detector circuit to give an alarm in case of fire and to supervise the system against defective detector heads, broken wires, or a similar failure that would make the system inoperative. Such a failure will de-energize the relays and close

Question 53:

You state that an ionization fire protection system alarming at the fire system control panel is installed below the control room suspended ceiling in the area behind the control panels. Appendix A to Branch Technical Position 9.5-1 requires that detectors be placed in each control room cabinet. Explain how the operator will know the location of the fire if detectors are not placed in each cabinet.

Response to Question 53:

The control room cabinets at the Cook Nuclear Plant consists of open and closed cabinets. Should a fire occure in any of the open cabinets in the control room, the products of combustion will readily escape and be sensed by the early warning ionization detection system. These detectors will alarm audibly and visually at the emergency fire panel in the Control Room. The closed cabinets in the Control Rooms are not air tight and in most cases are louvered to allow internally generated heat to dissipate into the Control Room. Products of combustion and smoke from a firein the cabinet will also escape and be sensed by the ionization detection system. These detectors, operating as a zone, will alarm audibly and visually at the Control Room emergency fire panel.

On receipt of this alarm, due to a fire in either an open or closed cabinet, the operator must investigate behind the panels to observe for the pulsing neon lamp on each detector itself until he finds the operating detector. At this point he can use hand portable fire extinguishers already available in the Control Room and behind the control panels to attack the fire. In this manner, a fire in a control room cabinet will be detected in its early stages and be extinguished before it could spread further. Should additional fire fighting apparatus be required, water hose standpipes, CO₂ hose reels and breathing apparatus are available just outside the control room entrance for operator use.

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CODE2154.DEK

NFPA 72D (1967 Edition) Code Section 2154

- <u>Deviation:</u> Documentation was not available to confirm that the alarm initiating and signaling circuits and cables installed for the systems reviewed, have met the criteria required by this code section for limited energy cable.
- <u>Justification</u>: The review of the Record of Conversation memos dated 6/8/88 and 6/9/88 in addition to the drawings referenced below, confirms that the alarm initiating and signaling circuits and cables installed for the Chemetron CO2, Pyrotronics system 3 and FIU systems and the Rochester "EF" annunciator panels, meet the requirements of this code section with the exception of the requirement that the cables be approved for the application of a limited energy cable.

A review of the cable description telex dated 3/16/88 forwarded to Impell from AEPSC, indicates the type, size and quantity of conductors for selected cables. The description of the type of insulation is also provided. The cables reviewed meet or exceed the requirements of Code Section 2155 which provides the requirements cable characteristics.

Based on the review of this documentation, an equivalency can be made that the cables reviewed, will meet the requirements of Code Section 2155 due to the attributes of the construction features of these cables.

Since the circuit characteristics for the alarm system meets the requirements of Code Section 2154 and an equivalency has been made to confirm compliance with the requirement for an "approved " cable as verified under Code Section 2155, these cables are considered to be acceptable for use in the alarm system as installed.

Reference:

-Record of Conversations

- a. D.E. Kipley (Impell) and S. Dimetravich (Chemetron), dated 6/8/88.
- D.E. Kipley (Impell) and D. Deipalmer (Rochester), dated 6/9/88.

-Telex 6142232004 page 1-5, cable descriptions and circuit characteristics, dated 3/16/88. -AEPSC Drawings:

1-2010-58, 5/23/86	1-95936-16, 4/15/88
1-2011-49, 5/18/87	1-95937-18, 4/24/86
1-2012-38, 5/21/87	1-95939-15, 11/20/87
1-98612-14, 3/1/88	1-95928-4, 10/15/86
1-98990-3, 10/16/86	1-95981-18, 3/17/87
1-98991-13, 2/16/88	1-98992-0, 11/15/72

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AEPSC NGD

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325	R	3 Conductor Twisted #10 S insulation EPR/Neoprene,0 EPR/Hypalon	tranded copper, 600V konite/Okoprene, or
348	N/A	3 Conductor Twisted #2 St 600V insulation EPR/Neopr Okonite/Okoprene	randed aluminum. ene or
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13 -> 12=7 3007 07 - 122.	1-2011 2000 1-46992 NCC 20114	1 Conductor #12 Stranded insulation XLPE	copper, 600V
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for Class 1 Signal Systems except as otherwise permitted in this Article, or other Articles, of this Standard. Flexible cords of the types described in Article 400 of the National Electrical Code shall not be used.

2150. Special Cables.

REPSC NGD

2151. Special cable approved for the purpose may be used as detailed in Paragraphs 2152, 2155, 2154, 2155, 2156.

2152. Low Voltage Applications. Cable for operation at 150 volts or less, shall be constructed as follows:

a. Conductors shall be of solid copper, not less than No. 14 AWG for single- and two-conductor cables, not less than No. 18 AWG for three- and four-conductor cables, and not less than No. 22 AWG for cables having more than four conductors.

h. The individual conductors shall have approved insulation having a nominal thickness of not less than 1/82 inch.

c. The cable conductors shall have a solid metallic sheath or a moisture-resistant and flame-retardant jacket providing equivalent protection against mechanical injury to that obtained with nonmetallic sheathed cable described in the National Electrical Code.

2153. The special cables may be installed exposed on a ceiling and on a side wall if not less than 7 feet from the floor and if adequately protected against injury. Concealed cable and cable passed through a floor or located on a side wall within 7 feet of the floor shall be installed in conduit or other approved raceway, unless solid metallic sheath is provided. Cable shall be adequately supported and terminated in approved fittings.

2154. Limited Energy Applications.

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Approved cable meeting the requirements of Paragraphs 2155 and 2156 may be used in circuits having energy limiting characteristics as follows:

L Circuit voltages not to exceed those shown in Column 1 of Table 1.

b. Maximum fault currents designed into the circuit not to exceed those shown in Column 2 of Table 1.

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72D-10 PROPRIETARY PROTECTIVE EXCHALING SYSTEMS

REPSC NGD

c. Noninterchangeable overcurrent protection not to ex-

1 614 223 2004

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d. Energy limitations not to exceed those shown in Column 4 of Table 1.

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Voltage Range		general river	AC ST
200-250	0.1 m	· _	
151-199	0.15 a		
61-150	1.00 a	1.00 a	· ••• · ••• //
31-60		164	100 va (See Note)
0-30		3.3 1	100 va (Sec Mote)

Note: Where batteries are used a resistor shall be in the circuit to limit the fault current to that obtained from a 100 vs spproved transformer of the same voltage output. Rectifiers and generators shall have built-in energy limiting characteristics equivalent to those of a 100 vs approved signaling transformer.

2155. Conductors of cable for use with limited energy circuits shall be:

a. Solid copper, bunched-tinned (bonded) stranded copper, or copper alloys of equivalent tensile strength

b. Not smaller than

1523

1. 16 gauge single conductor copper

2. 19 gauge multi-conductor copper

c. Covered by approved insulation having a 0.012 inch nominal 0.010 inch minimum thickness for both the outside jacket and the conductors. A single conductor cable shall have a jacket not less than 0.035 inch nominal 0.030 inch minimum thickness. Two or more conductors may be in flat parallel construction with 0.023 inch nominal integral insulation jacket, minimum 0.020 inch and with 0.031 inch minimum web.

d. The insulating compound shall have a temperature rating not less than 105°C and the jacket compound shall have a high degree of abrasion resistance.

2156. Limited energy cable described in Paragraphs **2154 and 2155 may be installed as follows:**

a. Exposed on surface of ceiling and sidewalls or "fished" in concealed spaces. Cable shall be adequately sup-

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4 P.16/23

Date: 6/9/88

Time: 1:25 PM EST

TELEPHONE CONVERSATION RECORD

Subject: Power Supply Data for Rochester Power Supply Model AN-159

From: David E. Kipley (Impell)

AEPSC NGD

To: Dino Deipalmer (Rochester) (716) 238-4917

Summary of Conversation:

I requested data information on the power supply data for power supply Model AN-159. Mr. Deipalmer indicated the following:

The AN-159 power supply outputs are:

Volts DC	Min. Current	Max. Current
-28	l amp	5.6 amp
+12	50 MA	500 MA
+12	50 MA	500 MA
+125	-	200 MA

In addition, I requested power data for the "EF" panel detection cards (Model AN-080). Mr. Deipalmer indicated that the detection circuits operate on 125 VDC at 1 MA.

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DEK/ems

cc: B. J. Gerwe

1 614 223 2004 P.17/23

Date: 6/8/88

Time: 3:00 PM EST

Page 1 of 2

TELEPHONE CONVERSATION RECORD

Subject: Data required to confirm compliance with NFPA 12 for EMPC cabinet manual actuator, selector valves, and typical circuit current output from CO₂ system relay cabinets.

From: David E. Kipley (Impell)

To: Steve Dimetravich (Chemetron) (312) 534-1000

Summary of Conversation:

I requested data on the following equipment:

- a. Maximum circuit current output from the CO₂ system relay cabinets
- b. The hydrostatic pressures and equivalent lengths for the CO₂ selector values
- c. Maximum pull pressure and travel distance of EMPC cabinet manual actuator
- Mr. Dimetravich indicated the following:
- a. The largest power consuming component connected to the relay cabinets are the EMPC solenoids. These devices are all 10 watt solenoids.

Note: The current consumption is the following: Amp =

 $Amp = \frac{Watts}{Volts}$

.040 = 10/250 VDC Amps

b. Selector valve data

1. All valves are hydrostatically tested at 1800 psi

2. Equivalent lengths of selector valves are the following:

Valve Pipe	Equivalent		
(Inches) Size	Length (Feet)		
1 1/2	72		
2	67		
3	99		
4	61		
6	185		

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Telephone Conversation Record - S. Dimetravich (Chemetron) Page 2 June 15, 1988

c. Data is not available for this request for the manual actuators of the EMPC cabinets.

DEK/ems

cc: B. J. Gerwe

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NFPA 72D (1967 Edition) Code Section 2223

- Deviation: Documentation reviewed indicated that the power cables connected to the Alison Control panels A924 from power panels 1&2-DAB, circuit 5, are under sized for the 35 AMP breakers provided.
- <u>Justification</u>: Based on the review of the letter from E.A. Taylor to B.J. Gerwe, indicates that these cables are adequate for the currents involved and are equivalent to the No. 10 AWG. wire required. Therefore, these cables are considered acceptable.
- <u>Reference:</u> -Letter discussing the results of the evaluation performed for NFPA 72D Code Section 2223 from E.A. Taylor (AEPSC) to B.J. Gerwe (AEPSC), dated 4/26/88.

MAY-04-1995 15:52



1 614 223 2004 P.20/23



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Date April 26, 1988

Subject NFPA Code Compliance Impell Corp. Recommendations

PIPING, HVAC

From E. A. Taylor

APR 27,1988

To 'B. J. Gerwe

FIRE PROTECTION

This memo is in response to your request for information dated 2/25/88. We have reviewed the recommendation on Code Section 2223 dealing with the comparison of a #7/18 AWG cable vs. a #10 AWG cable. The recommendation was to replace the #7/18 AWG with a #10 AWG.

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An engineering evaluation was performed comparing a #7/18 to a #10 cable. A #7/18 AWG wire is larger than a #10 AWG and therefore the recommendation for upgrade to a #10 AWG is illogical.

The other item requiring investigation, Code Section 2154 on energy limitations, is awaiting further clarification from Impell.

Elizabeth Taylor

EAT/jj/84.53 Approved

cc: T. O. Argenta/S. H. Horowitz L. F. Caso/J. V. Ruparel D. N. Turnberg/J. R. Anderson S. Z. Parsons/J. J. Kutys, Jr. FILE: Cables



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arranged in columns.

point module - see alarm module.