



February 29, 2000

C0200-07  
10 CFR 50.09

Docket Nos.: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
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Washington, D.C. 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2  
CORRECTION TO INFORMATION USED TO GRANT  
APPENDIX R, III.O EXEMPTION

- References:
1. Letter AEP:NRC:0692, "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 - Appendix R Compliance," dated May 4, 1982
  2. Letter AEP:NRC:0692D, "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 - 10 CFR 50, Appendix R, Section III.O," dated December 30, 1982
  3. Letter NRC to AEP from Steven A. Varga to Mr. John Dolan, "Exemption From Requirements of App. R to 10 CFR 50, Sections III.G and III.O," dated December 23, 1983

The purpose of this letter is to provide corrected information related to a previous exemption request. Incorrect information had been provided by Indiana Michigan Power Company (I&M) and was cited in the NRC Safety Evaluation Report that was issued when the exemption was granted.

In References 1 and 2, I&M requested an exemption from a 10 CFR 50, Appendix R, Section III.O requirement that the reactor coolant pump (RCP) oil collection system be sized to collect oil from all potential leakage sites. The NRC approved the requested exemption in Reference 3. I&M stated in References 1 and 2 that the flash point for the RCP motor oil (Mobil SHC 824)

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was 480°F and that there were no ignition sources at the floor level of the lower containment. This flash point value was used in the exemption request to help justify the smaller tank size by showing that, should the oil spill onto the piping insulation or overflow onto the floor, it would not present a fire hazard by igniting.

I&M has since determined that the flash point for the synthetic RCP oil is approximately 425°F. Even though this value is 55°F lower than the previously stated value, it does not compromise plant safety. Should the oil come in contact with the surface of the hottest insulation in the proximity of the RCP motors it will not result in the ignition of the oil. The maximum design surface temperature for the mirror insulation is approximately 140°F. Only noncombustible, non-oil absorbent, metal-jacketed mirror insulation is used in the potential oil spill area.

I&M has also determined that there are electrical ignition sources in the area of the oil collection tank. The operating and surveillance procedures that administratively control these electrical circuits are being revised to ensure that these electrical ignition sources are deenergized whenever a RCP is running.

Based on the information above, I&M considers that the previous exemption to 10 CFR 50, Appendix R, Section III.O remains justified. This letter is for information only. No staff action is requested.

Attachment 1 summarizes the new commitments made in this letter.

Should you have any questions, please contact Mr. Robert C. Godley, Director of Regulatory Affairs, at (616) 466-2698.

Sincerely,



M. W. Rencheck  
Vice President Nuclear Engineering

/dms

Attachment

c: J. E. Dyer  
MDEQ – DW & RPD, w/o attachment  
NRC Resident Inspector  
R. Whale, w/o attachment

ATTACHMENT 1 TO C0200-07

COMMITMENTS

The following table identifies those actions committed to by Indiana Michigan Power Company (I&M) in this submittal. Other actions discussed in the submittal represent intended or planned actions by I&M. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Date
The operating and surveillance procedures that administratively control these electrical circuits are being revised to ensure that those electrical ignition sources are deenergized whenever a reactor coolant pump is running	Prior to running a reactor coolant pump for the applicable unit.