

AMERICAN ELECTRIC POWER Service Corporation



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*Repts.  
Unit*

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August 8, 1979

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

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315/316*

REF: IE Bulletin Nos. 79-05C and 79-06C

Dear Mr. Keppler:

Upon receipt of the referenced IE Bulletin, we immediately instituted Item 1., Parts A. and B. at the Donald C. Cook Nuclear Plant. With separated control rooms, to fulfill the requirements of Item 1.B. requires that two licensed operators be available at all times in each of the two control rooms. Although our Technical Specifications only require the presence of one licensed operator in each control room during normal plant operations, our normal shift complement provides us with two licensed operators in each control room. However, during periods of vacation relief, illness, and requalification training, it is necessary to work licensed operators overtime to provide the two licensed operators in the control room. We also interpret the bulletin to mean that during those short periods of time when one of the licensed operators leaves the control room to visit the lavatory or to obtain a cup of coffee, it is necessary to relieve him with another licensed operator before he exits the control room. During the first 80 calendar hours this bulletin was instituted at the Cook Nuclear Plant, it required that we work 32 hours of licensed operator overtime to meet the requirements of the bulletin.

We are requesting relief from this bulletin to the extent that in those cases where the working of overtime by licensed operators is required to meet the requirement of Item 1.B. of the bulletin we be permitted to use a non-licensed operator, fully qualified, to trip the reactor coolant pumps and to take any other action specified by the licensed operator. These qualified but non-licensed operators would have a minimum of two years experience working at the Cook Nuclear Plant.

We believe that the working of overtime by licensed operators to fulfill the requirements of this bulletin detracts from the overall functioning of the Plant Operations Department. We believe our request, if granted, will

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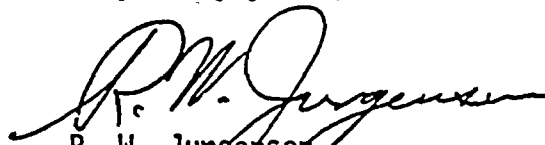
Mr. J. G. Keppler, Regional Director

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meet the intended purpose of Item 1.B., and at the same time eliminate unnecessary overtime which could have a detrimental effect on the overall performance of the licensed operator.

Very truly yours,



R. W. Jurgensen  
Chief Nuclear Engineer

RWJ:clb

cc: R. C. Callen  
G. Charnoff  
D. V. Shaller - Bridgman  
John E. Dolan  
R. S. Hunter

