

INDIANA & MICHIGAN ELECTRIC COMPANY

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NEW YORK, N. Y. 10004

July 23, 1980
AEP:NRC:0393B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74

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

Ref: Region III Letters to AEPSC dated: May 22, 1979
June 22, 1979
March 20, 1980
April 18, 1980

Attention: T. Essig and A. B. Davis

Dear Mr. Keppler:

This letter serves to transmit to you our concerns and questions regarding the intent and use of the Health Physics Network (HPN) during an emergency at the Donald C. Cook Nuclear Plant. Our concerns are:

1. The purpose and use of the HPN in the above-referenced letters is contradictory. The NRC, through its communication with us, has not established specific and consistent procedures for the use of this network. We suggest that you consolidate these letters into one procedure after you have reviewed the remainder of our comments.
2. How the NRC intends to confirm that accurate information is being relayed has not been established or communicated to AEP. If this concern is not resolved, it appears that this second emergency communications network could serve as a point of confusion if conflicting information is given over this network versus the Emergency Notification System (ENS). Operating on a duplicate mode such as this could very well cause confusion.

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3. Your letter of February 20, 1980, states that the HPN is to be used during "an abnormal occurrence" as well as for the "routine transmission of information requested by the NRC".

It is our concern that the NRC will be getting information from Plant members without the knowledge of the Plant Management. This is quite plausible, since the HPN has extensions presently located in the Radiation Protection Supervisor's office, in the Emergency Assembly area in the basement of the office building and one in the NRC Resident Inspector's office.

The same holds true during the routine transmission of information between the NRC and the Plant. There is again, the possibility that information from the NRC may be transmitted without Management being aware of it. While we can take steps on our part to prevent this unauthorized communication, this concern once again shows that a clarifying procedure is needed from you, so that all parties are aware of the proper usage of these telephones.

4. In your letter of April 18, 1980, it was stated that "in the event of a site emergency, the NRC will activate the HPN... The HPN is a restricted network and may not be used by non-government employees at any time unless... a significant event and both the ENS and commercial telephone lines are out of service". Your letter of March 20, 1980 transmitted to us a System Description which contained information contrary to these directions. Clarification as to who is permitted to activate the HPN is therefore needed.
5. The locations of the Health Physics Network at any facility and the specific requirements for our facility are not clear. The NRC should consider integrating the HPN with the emergency operating centers (TSC, EOF, etc.).
6. How does the NRC intend to test the HPN to ensure its reliability and functionability?
7. If the primary function of the HP telephone is to support Health Physics operations during a nuclear incident, it is our opinion that the telephones should not be used for the routine transmission of information requested by the Commission or facsimile traffic.

Very truly yours,



R. S. Hunter
Vice President

cc: Attached

Mr. J. G. Keppler

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

