

INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

September 18, 1981
AEP:NRC:00614

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE REPORT NOS. 50-315/81-17; 50-316/81-20

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

Dear Mr. Keppler:

The attachment to this letter provides our response to the Notice of Violation contained in Attachment A to IE Inspection Report Nos. 50-315/81-17; 50-316/81-20 transmitted to us via Mr. C. E. Norelius's letter of August 19, 1981. As you requested, we have given particular attention to Item 1 in the Notice of Violation.

Very truly yours,


R. S. Hunter
Vice President

cc: John E. Dolan - Columbus
R. C. Callen
G. Charnoff
R. W. Jurgensen
D. V. Shaller - Bridgman
Joe Williams, Jr.
Region III Resident Inspector - Bridgman

8111060488 811103
PDR ADDCK 05000315
Q PDR

SEP 25 1981

THE UNIVERSITY OF CHICAGO
LIBRARY

1950

Attachment to AEP:NRC:00614

Response to Item 1 of Appendix A

Part 1 - Review of Changes in Facility Design, Operating
Procedures and Facility License

As described to Mr. Holzmer during his inspection, the delinquent review assignments were being reissued to the personnel who either did not complete the assignment or whose documentation of review was missing. This reissue process is continuing until all necessary documentation is returned to the Training Section. To aid in the timely return of this documentation, all future review records will be issued individually to each person required to review the information. Previous review records contained documentation of up to twenty or more individuals, thus, causing excessive routing and review times. As of September 1, 1981, eleven of the thirty-four outstanding records identified by Mr. Holzmer have been returned to the Training Section. The remainder of the outstanding records shall be completed by November 1, 1981.

As stated above, future review records will be issued to each individual whose review is required thereby eliminating excessive routing and review times and reducing the probability of losing such records during the review process. Furthermore, any review records issued that are not returned to the Training Section within sixty (60) days of issue shall be reissued to the individuals involved with a copy to their immediate supervisor. Failure to return the appropriate documentation to the Training Section within thirty days of reissue will be considered as an act of insubordination and therefore will subject the delinquent individual to disciplinary action. We believe that the corrective actions taken will avoid further repetition of these non-compliances in the future. Full compliance will be achieved no later than November 1, 1981.

Part 2 - Review of Abnormal and Emergency Procedures

The five licensed operators who failed to return the review documentation at the time of the IE Inspection have since forwarded the necessary documentation to the Training Section. Assignments for the review of Abnormal and Emergency Procedures shall be reissued by the Training Section if assignments are not returned within thirty days of original issue. Copies of the reissue will also be sent to the individual's immediate supervisor to ensure completion. If the assignments are not returned to the Training Section within sixty days of original issue (thirty days after reissue) the individuals shall be removed from licensed duties until the assignments are completed. We believe the corrective actions taken will avoid similar non-compliances in the future. Full compliance has been achieved as of August 28, 1981.

Response to Item 2 of Appendix A

Article 2 of Appendix A to 10 CFR 55 states:

"The requalification program shall include preplanned lectures on a regular and continuing basis throughout the license period in those areas where annual operator and senior operator written examinations indicate that emphasis in scope and depth of coverage is needed in the following subjects..." (a list of nine areas follows in 10 CFR).

A brief summary of the process used by the Cook Plant Training Section for planning the upcoming year's lecture series follows. A detailed breakdown of all the written examinations is performed on a question by question basis. Based on these data, a list of questions is compiled for which the individuals as a group scored less than eighty percent (80%). These questions are then organized by topic for incorporation into specific lesson categories. These topics are then covered during the eight or nine requalification lecture periods. Each lecture period consists of approximately sixteen hours of instruction and examination.

Handwritten sheets reflecting the above described process were reviewed by the Inspector during his site visit. While we believe that the handwritten method employed by our Training Section has been doing the job, we agree with your inspector that a more formal method would be better. Therefore, steps are being taken to enhance documentation of future analyses of examination results.

We believe that the process described above fulfills the requirement of Appendix A to 10 CFR 55 with regard to preplanned requalification lectures and request that this violation be withdrawn.

