INDIANA & MICHIGAN ELECTRIC COMPANY

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

October 16, 1981
AEP:NRC:0625

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 INSPECTION REPORTS 50-315/81-20; 50-316/81-23

Mr. James G. Keppler, Director
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

In response to your request at the Enforcement Conference between the NRC Region III and Indiana & Michigan Electric Company on August 4, 1981 concerning the operation of the Donald C. Cook Nuclear Plant and your September 3, 1981 letter, the following is provided relative to upgrading the operations at the Plant, improving the support from AEPSC, and minimizing the types of events that formed the basis for the Enforcement Conference.

A review of Plant management activities is being performed by an assessment team consisting of two consultants, Mr. W. W. Lowe of Pickard, Lowe and Garrick, and Admiral Joe Williams, Jr. and the AEPSC Assistant Division Manager - Nuclear Operations. In-depth interviews have been held with Department Heads and other key Plant personnel. The objective of the interviews, which were initially conducted on August 26-27 with followup interviews on September 21, was to gather information on the problems our Department Heads are experiencing and then, jointly between AEPSC and the Plant, to come up with actions which enhance the ability of Department Heads to manage and control their job activities. We are in the process of evaluating data from these interviews. Several potential corrective actions appear promising, but these need further evaluation and discussion before they will be implemented. However, we have found from the interviews that there are some actions that we can now initiate.

The following items illustrate the actions that we are now undertaking in response to specific items identified by your organization as well as those determined through our assessment program.

1) We are drafting an AEP corporate nuclear policy statement. This corporate policy will apply to personnel at Cook Plant, and personnel who support the Cook Plant operation in the AEPSC engineering office, and in the Indiana & Michigan Electric Company. Upon its establishment the corporate policy will be made known to all such personnel. With this guidance we expect to motivate all groups to work as one team with the common objective of upgrading our performance.

2) Position descriptions are being reviewed and updated where necessary at the Plant and at the AEPSC New York Office.

3) A full-time Fire Protection Coordinator has been hired. He will report directly to the Plant Manager.

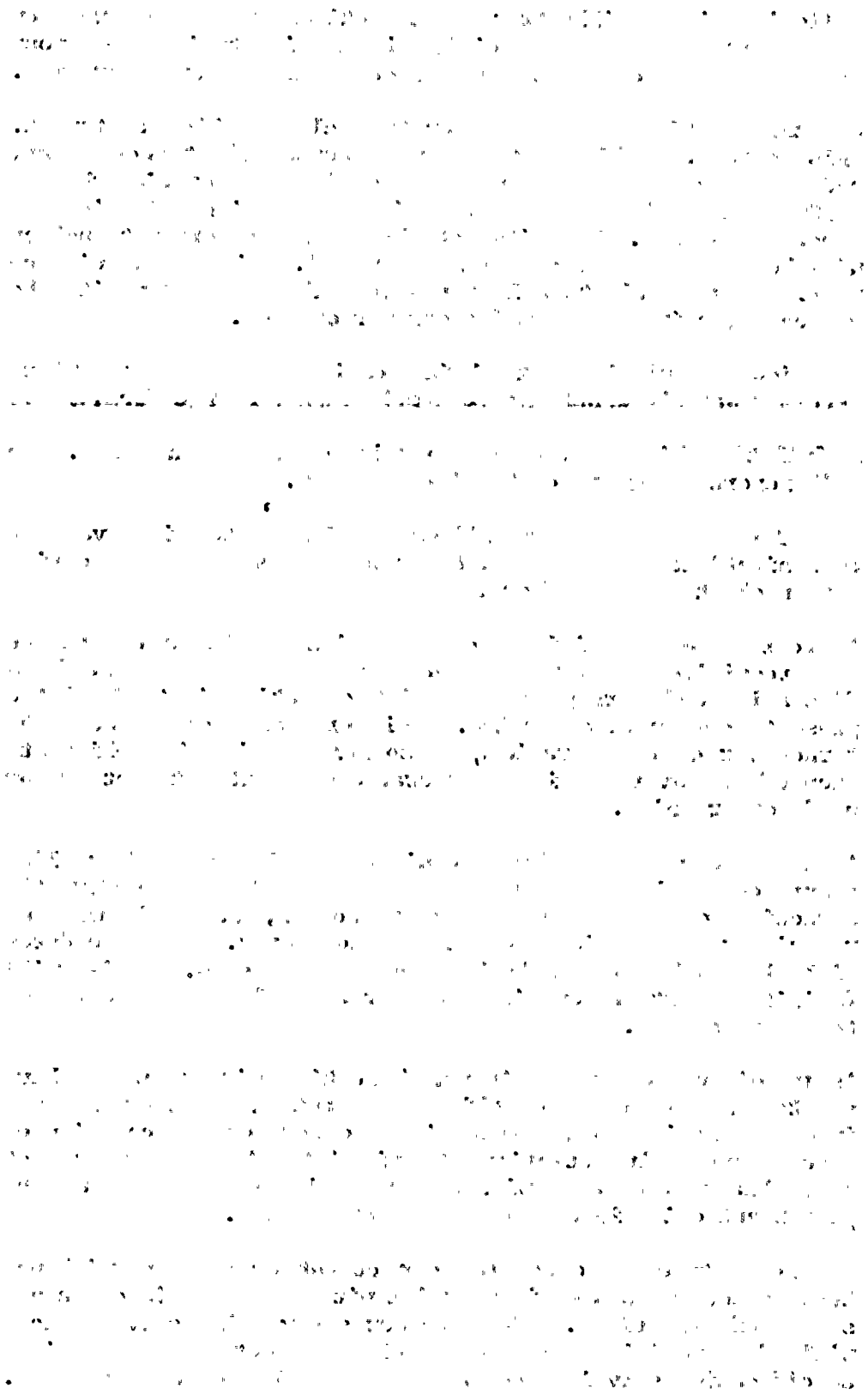
4) We plan to issue guidelines designed to improve the communications between Plant personnel and the supporting personnel at AEPSC New York.

5) A program has been initiated which will permit us to attract the requisite number of Operations personnel to staff a five-shift and perhaps a six-shift operation instead of the present four-shift operation. This program should reduce the turnover rate of Operations personnel and in time eliminate much of the overtime in the Operations Department that is now used for training.

6) A task force, including cognizant engineers and quality assurance engineers from the New York Office, under the direction of Plant Operations personnel, is reviewing and revising the Operations Department procedures. The procedures will be reissued utilizing word processors. This will facilitate further revision and virtually eliminate the use of temporary sheets.

7) As we discussed at the August 4 meeting with you, we have adopted the policy under which the Plant Management will take immediate action where appropriate to correct non-compliances brought to their attention at exit interviews. Matters not under Plant cognizance will be expeditiously referred to the proper authority in the AEPSC New York Office.

8) We are continuing to develop our computer-based surveillance test scheduling system in parallel with the established manual system of scheduling. The procedures governing surveillances will be verified to accurately reflect the technical specification surveillance data base in the computer program.



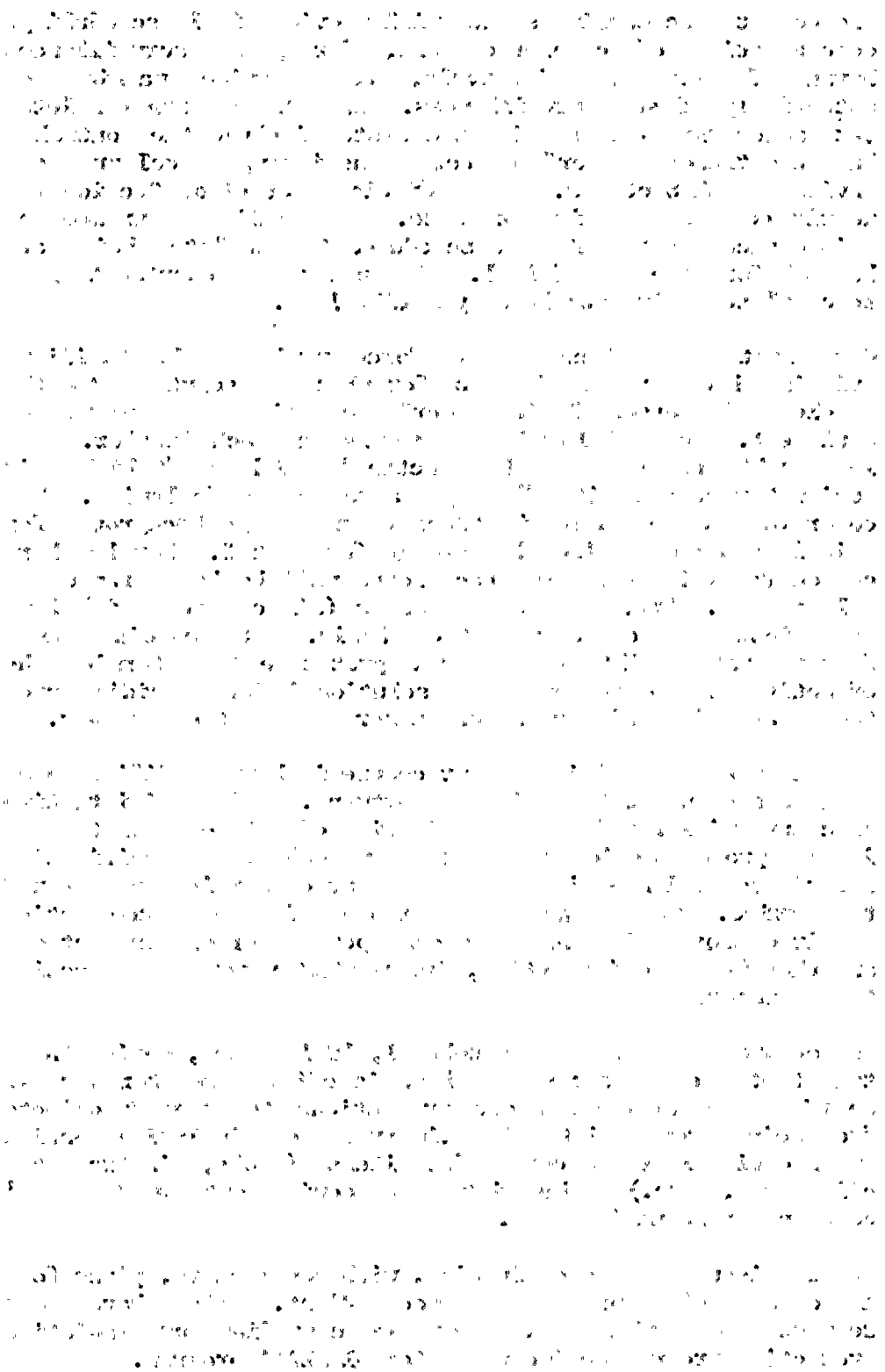
The computer scheduling system will provide timely scheduling, documentation of completion and, for those surveillances having longer time intervals, can provide warning of potentially missed surveillances. The groups with completed data bases which are testing the system include the Control & Instrumentation, Performance, Chemistry, Nuclear and Environmental Sections. The Radiation Protection Section has nearly completed their data base. The Quality Assurance and Maintenance Departments are scheduled to complete their data bases before the end of 1981. The Operations Department plans to complete their data base by April, 1982.

9) Our Plant Human Factors Task Force reviewed the Auxiliary Building breaker labeling to formulate a solution to the problem of personnel incorrectly changing the status of equipment. New labels will be placed on each breaker. The label will be a 10" x 14" rectangle with a 6" high Unit designator number with 3" high valve number following. The color of the lettering is black on an orange background for Unit 1, and on a yellow background for Unit 2. For breakers common to both Units, the background will be half orange and half yellow. Twelve of these labels (six on each Unit) have been installed on a prototype basis. The ongoing human factors review will evaluate the prototype to determine the effectiveness of the proposed solution before deciding upon the final Unit designation scheme for all Plant components.

10) Our independent verification procedure is being modified on a trial basis in the Operations Department. This Administrative procedure will require the utilization of a two-person team to insure proper action whenever any technical specification identified equipment is being taken out of service or restored to service. One of the team members will read the action required aloud, observe the second person perform the action, and then by close inspection, independently verify the action to be proper.

11) As you are aware from our October 1, 1981 letter, during the time that the reactor vessel head is off the reactor vessel, we will take more stringent precautions to prevent objects from being dropped into the primary system, including posting an individual to account for items (tools, instruments, clipboards, etc.) going into and coming out of the 650' containment refueling area.

12) We are discussing and evaluating, with contractors, plans for a formal ALARA program at Cook Plant. They have been requested to submit proposals for upgrading our radiation protection program to include a formal ALARA program.



These actions address areas listed in your September 3, 1981 letter. As a result of our Plant interviews we expect other actions to be forthcoming. As you requested, we are prepared to meet with you on a mutually agreeable date.

Very truly yours,

R. S. Hunter
Vice President

RSH/emc

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