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AUTH. NAME AUTHOR AFFILIATION
HUNTER, R. S. Indiana & Michigan Electric Co.
RECIP. NAME RECIPIENT AFFILIATION
DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to 820505 Generic Ltr 82-10 re post-TMI requirements.

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TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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	NRR/DE DIR	21	1	1	NRR/DE/ADCSE	22	1	1
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	NRR/DL/ADSA	17	1	1	NRR/DL/ORAB	18	3	3
	NRR/DSI DIR	24	1	1	NRR/DSI/ADDPS	25	1	1
	NRR/DSI/ADRP	26	1	1	NRR/DSI/ADRS	27	1	1
	NRR/DSI/AEB		1	1	NRR/DSI/ETSB		1	1
	NRR/DSI/RAB		1	1	NRR/DST DIR	30	1	1
	NRR/DST/ADGP	31	1	1	NRR/DST/ADT	32	1	1
	REG FILE	04	1	1	RGN3		1	1
EXTERNAL:	ACRS	34	10	10	FEMA-REP DIV		1	1
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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8207020159 DOC.DATE: 82/06/28 NOTARIZED: YES DOCKET #
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AUTH.NAME AUTHOR AFFILIATION
HUNTER,R. S. Indiana & Michigan Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to 820505 Generic Ltr 82-10 re post-TMI requirements.

DISTRIBUTION CODE: A046S COPIES RECEIVED:LTR 7 ENCL 7 SIZE: 7
TITLE: Response to NUREG-0737/NUREG-0660 TMI Action Plan Rqmts (OL's)

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	IE/DEP EPDS	1	1	IE/DEP/EPLB	3	3
	NRR/DE DIR 21	1	1	NRR/DE/ADCSE 22	1	1
	NRR/DE/ADMOE 23	1	1	NRR/DHFS DIR 28	1	1
	NRR/DHFS/DEPY29	1	1	NRR/DL DIR 14	1	1
	NRR/DL/ADL 16	1	1	NRR/DL/ADOR 15	1	1
	NRR/DL/ADSA 17	1	1	NRR/DL/ORAB 18	3	3
	NRR/DSI DIR 24	1	1	NRR/DSI/ADDPS25	1	1
	NRR/DSI/ADRP 26	1	1	NRR/DSI/ADRS 27	1	1
	NRR/DSI/AEB	1	1	NRR/DSI/ETSB	1	1
	NRR/DSI/RAB	1	1	NRR/DST DIR 30	1	1
	NRR/DST/ADGP 31	1	1	NRR/DST/ADT 32	1	1
	REG FILE 04	1	1	RGN3	1	1
EXTERNAL:	ACRS 34	10	10	FEMA-REP DIV	1	1
	INPO,J. STARNES	1	1	LPDR 03	2	2
	NRC PDR 02	1	1	NSIC 05	1	1
	NTIS	1	1			

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INDIANA & MICHIGAN ELECTRIC COMPANY

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

June 28, 1982
AEP:NRC:0678A

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
POST-TMI-REQUIREMENTS (GENERIC LETTER NO. 82-10)

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

This letter and its Attachment respond to Mr. Eisenhut's Generic Letter No. 82-10 dated May 5, 1982.

Very truly yours,

RSH/os

R. S. Hunter
Vice President

cc: John E. Dolan - Columbus
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
NRC Resident Inspector at Cook Plant - Bridgman

A046

8207020159 820628
PDR ADOCK 05000315
P PDR

STATE OF NEW YORK)
COUNTY OF NEW YORK)

R. S. Hunter, being duly sworn, deposes and says that he is the Vice President of Licensee Indiana & Michigan Electric Company, that he has read the foregoing response to Generic Letter No. 82-10 and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

R. S. Hunter

Subscribed and sworn to before me this 28th day of June, 1982

Notary Public

KATHLEEN BARRY
NOTARY PUBLIC, State of New York
No. 41-4606792
Qualified in Queens County
Certificate filed in New York County
Commission expires March 30, 1983

Attachment to AEP:NRC:0678A
Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Response to Generic Letter No. 82-10

Item I.A.1.3.1 (Limit Overtime)

The necessary modifications to administrative procedures required to limit overtime in accordance with the NRC policy statement issued by Generic Letter 82-02 dated February 8, 1982 will be completed on or before October 1, 1982.

Item I.A.1.3.2 (Minimum Shift Crew)

All of the requirements for shift staffing set forth on pages 3 to 9 of NUREG-0737 will be met on or before July 1, 1982.

Item I.C.1 (Revise Emergency Procedures)

Although the schedule for Revised Emergency Procedures promulgated in NUREG-0737 required implementation by the first refueling after January 1, 1982, we understand that the NRC Commissioners are presently considering a revised implementation schedule for this Item under the topic of SECY 81-111 entitled "Requirements for Emergency Response Capabilities." It is apparent that NRC action on this document is scheduled for June of 1982 at which time a revised implementation schedule will undoubtedly be published. However, it is our current plan to have all Unit 1 and 2 Emergency Procedures revised and issued for use prior to Unit startup following the scheduled Unit 1 and 2 refueling outages for mid-1983 and mid-1984, respectively.

II.D.1.2 (RV & SV Test Programs)

As required by this Item, a preliminary evaluation which demonstrates the capability of relief and safety valves to operate under expected operating and accident conditions was submitted to the NRC in our letter No. AEP:NRC:0585B dated April 7, 1982.

II.D.1.3 (Block Valve Test Program)

Consumers Power Company has transmitted the EPRI report on the Block Valve Test Program on our behalf in a letter from Mr. R. C. Youngdahl to Mr. H. R. Denton dated June 1, 1982. This fulfills our commitment for this Item.

Items II.K.3.30 & 31 (SB LOCA Analysis)

Implementation of Item II.K.3.31 is dependent on fuel vendor implementation of Item II.K.3.30. We will implement Item II.K.3.31 within one year following Item II.K.3.30 implementation.

III.A.1.2 (Staffing Levels for Emergency Situations)

The requirements of the minimum Staffing Levels for Emergency Situations, as suggested by the NRC, has previously been addressed in Table 12-1 entitled "Donald C. Cook Nuclear Plant Staffing for Radiological Emergencies" of our upgraded Emergency Response Plan for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2 submitted to the NRC in our letter No. AEP:NRC:0308B dated January 26, 1981. Table 12-1 was developed at the Plant as a result of a review of the manpower availability in response to a nuclear incident. Several exceptions were taken to the NRC's suggested requirements and are listed below.

Functional Area	NRC		AEP	
	30 min	60 min	30 min	60 min
Radiological Accident Assessment Offsite Survey	2	2	1	1
Plant System Engineering Core/Thermal Hydraulic	1	-	-	1
I&C	1	-	-	1

The suggested NRC requirements indicate that certain functions may be provided by shift personnel and that minimum manning of the unaffected Unit be limited to three personnel. Our manning requirements, as listed in Table 12-1, allow for two individuals from the unaffected Unit to assist in manning or augmenting the affected Unit (1 Control Room operator and 1 Auxiliary operator). We have defined the time for reasonable "Capability for Additions" as the time from which the individual is notified to the time he reports to the location indicated by the Shift Supervisor.

Thus, while we do not explicitly meet the suggested NRC requirements, we do meet overall total augmentation capability and believe that our levels of staffing are adequate to meet the needs of our Emergency Plan implementing procedures. As such, we request an exemption from the specific NRC requirements recommended to be implemented by July 1, 1982.

Item III.A.1.2 (Upgrade Emergency Support Facilities)

Unit 1

We currently plan to complete the physical installation of the modifications required by this Item by October 1, 1982. However, the checkout and debugging time required to fully implement this Item is somewhat uncertain at this point. As such, we believe that additional time will be necessary. We will be in a better position to ascertain how much additional time is necessary by the end of the upcoming scheduled Unit 1 refueling outage. We will thus inform you of the status of this Item by September 15, 1982.

Unit 2

We will need an extension of the scheduled completion date. This extension request is based on the fact that the Unit 2 computer will not be delivered until late August and many of the physical modifications must be completed during the upcoming Unit 2 refueling outage. In addition, the checkout and debugging time required to fully implement this item is somewhat uncertain at this time. We will be in a better position to ascertain how much additional time is necessary after the completion of the Unit 1 system. We will inform you of the status of this item by January 15, 1983.

Item III.A.2.2 (Meteorological Data)

This Item is basically concerned with three subjects: (1) Meteorological Measurements Program, (2) Class A Dose Assessment Capability, and (3) Class B Dose Assessment Capability. The requirement in Generic Letter 82-10 is that "Complete modifications" be done by the "recommended schedule" of October 1, 1982. Our response to each of these three subjects is given below:

1. Meteorological Measurements Program

The Donald C. Cook Nuclear Plant has wind speed, direction and temperature sensors on one tower, the microwave tower on-site. There are two sensors for each of these measurements, therefore providing redundancy. The meteorological data can be interrogated at the Plant and remotely. Since we do not have a second meteorological tower, we consider one set of sensors as providing the primary meteorological measurements system and the redundant sensors as providing the backup meteorological measurements system. In conjunction with our review of the Class B dose assessment model, we will review the need for a backup meteorological tower. We will provide the NRC with a status of our review of a second tower by September 1, 1982.

2. Class A Dose Assessment Capability

Currently, there are two models available for calculating off-site radiation doses.

One, designated CPM002, is an in-house computer program developed by AEPSC. This program uses gross radiation monitor readings of known isotopic concentrations. It utilizes meteorological data with a straight line Gaussian dispersion model, or it can input X/Q values. Instantaneous whole body and thyroid dose rates are calculated for a given release time. Dose assessment using CPM002 will be performed in the Plant's Technical Support Center and will be able to be performed in the final Emergency Operations Facility. CPM002 does not directly include estimates of plume dimensions and position, magnitude of peak concentrations, arrival times, and projected doses. However, the MIDAS system provides dispersion information (X/Q) which may be input into the CPM002 program.

The second dose assessment capability exists through the use of the MIDAS Class A program. This program is available to us through our consultant Pickard, Lowe and Garrick (PL&G). This model is basically a straight-line Gaussian model which takes into account local terrain and pertinent site/plant specific factors such as release height, exit velocity, vent or stack diameter and building wake effects. According to our consultant the Class A model (ACRISO) meets the specifications on pages 2-3 of NUREG-0654, Appendix 2 in that it includes estimates of plume dimensions and position, magnitude of peak concentrations as well as arrival times, projected doses and time to reach Protective Action Guideline dose levels when isotopes and activities are known. The ACRISO program can be accessed from the PL&G office and the AEPSC-NY office. The program will be available for use in the Technical Support Center and in the final EOF. The application of the Class A model to the Cook Plant is limited in that under certain conditions it does not account for the effects of Lake Michigan. We will review the MIDAS Class A model with PL&G to determine the effects which the lake may have in meeting the NRC requirements for a Class A model. We will also review with PL&G setting up the files to allow us to use the Class A ACRISO program when the in-Plant radiation monitor readings are known. We will provide the NRC with a status of our review by September 1, 1982.

3. Class B Dose Assessment Capability

We do not have the capability for a Class B model as defined in NUREG-0654. A Class B model development is currently under review with our consultant. No firm schedule is available, as the full extent of the software and hardware requirements are unknown at this time. NUREG-0737 requests that a description of the Class B model be provided to the NRC by September 1, 1982 and that the Class B model have full operational capability by June 1983. We will provide the NRC with a status of our review of a Class B model development by September 1, 1982.

✓ Item III.D.3.4 (Control Room Habitability)

We confirm the commitment date of January 1, 1983 for implementation of the control room habitability modifications given in our letter No. AEP:NRC:0398C dated February 9, 1981.