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ACCESSION NHR:7911010455 DOC.DATE: 79/10/24 NOTARIZED: NO DOCKET #
 FACIL:50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
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 DENTON, H.R. Office of Nuclear Reactor Regulation

SUBJECT: Responds to NRC 790913 ltr re implementation of recommendations in NUREG-05788 on emergency power supply, relief & safety valve testing, instrumentation for inadequate cooling & diverse containment isolation.

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October 24, 1979
AEP:NRC:00253

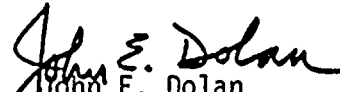
Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74

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

Dear Mr. Denton:

The attachment to this letter provides our response to Mr. D. G. Eisenhower's letter of September 13, 1979 concerning the implementation of the recommendations contained in NUREG-0578 as supplemented by items (a) through (f) in his letter, and the emergency preparedness requirements provided in Enclosures 7 and 8. Our responses are in the same item format as Enclosures 6 and 8 of Mr. Eisenhower's letter.

Very truly yours,


John E. Dolan
Vice President

JED:em

cc: R. C. Callen
G. Charnoff
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ATTACHMENT TO AEP:NRC:00253

DONALD C. COOK NUCLEAR PLANT
DOCKET NOS. 50-315 and 50-316
LICENSE NOS. DPR-58 and DPR-74

RESPONSE TO ITEM 2.1.1, EMERGENCY POWER SUPPLY REQUIREMENT

a. Pressurizer Heaters

AEP is a member of the Westinghouse TMI Owners' Group. As part of the Owners' Group activities, Westinghouse has conservatively calculated that the minimum block of heaters to be powered from each safety train is 150 KW and the recommended availability time is one hour following the case with the worst need to maintain subcooling of the reactor coolant fluid. The Cook Plant will have the capability for this capacity of pressurizer heaters to access each emergency diesel train by January 1, 1980.

b. PORV's and Block Valves

Each pressurizer has three spring-closed, air-to-open relief valves. Each relief valve (PORV) has a motor-operated block valve in series. The air to each PORV is controlled by a three-way solenoid valve. Solenoid de-energization closes the PORV. The solenoid and the motor-operated block valves for a given PORV are powered from the same emergency power supply. If the solenoid valve and the block valve were to be powered from different emergency power supplies, the failure of one power supply would prevent opening the PORV's if the corresponding block valves had been closed previously. As stated in WCAP-9600, the analysis of a postulated loss of feedwater requires the opening of a PORV within 2500 seconds in order to maintain core cooling. In view of this requirement and that the PORV's close or remain closed on loss of power, we plan to leave each PORV and its block valve on the same power supply. Therefore, the design meets the requirements of NUREG-0578 for power supply from an emergency power source.

AEP is reviewing the design to determine if the system, as installed, meets the NUREG-0578 safety grade requirements. We believe the current system will function correctly, but an analysis is being performed to verify this. This analysis will be completed by January 1, 1980.

c. Pressurizer Level

Each Unit's pressurizer is provided with three level transmitters. Each instrument channel is powered from a different, safety grade instrument bus. The design meets the requirements of NUREG-0578 without modification.

RESPONSE TO ITEM 2.1.2, RELIEF AND SAFETY VALVE TESTING

AEP, as part of the Westinghouse TMI Owner's Group, is participating in the relief and safety valve testing to be conducted under the direction of the Electric Power Research Institute. We understand that the program description and schedule will be submitted by EPRI to the NRC by January 1, 1980.

RESPONSE TO ITEM 2.1.3.a, DIRECT INDICATION OF VALVE POSITION

The pressurizer PORV's at Cook Plant have limit switches which indicate the open and closed positions of the valves in the control room. In addition, there is a temperature indication and alarm in the common discharge pipe. Limit switches, which the vendor indicates are qualified for this service, have been ordered. It is estimated that delivery will take two months. These switches will be installed at the first suitable outage of sufficient duration after the equipment is available.

The pressurizer safety valves have individual discharge temperature indications and alarms displayed in the control room. An investigation by AEP of installing some form of direct indication on these valves is underway. Direct indication will be installed at the first suitable outage of sufficient duration after the equipment is available. In the meantime, valve position can be inferred from the discharge temperature and pressurizer relief tank level, pressure and temperature.

RESPONSE TO ITEM 2.1.3.b, INSTRUMENTATION FOR INADEQUATE CORE COOLING

a. Procedures

The Westinghouse TMI Owners' Group, of which AEP is a member, is carrying out analyses and studies which will identify measured parameters that the reactor operator can use to identify the existence of inadequate core cooling. This is being done in accordance with Item 2.1.9. After this work is completed, the results will be incorporated into specific procedures and operator training programs for the Cook Plant.

b. Subcooling Meter

AEP is reviewing three designs of subcooling meters for compatibility with the Cook Plant instrumentation. Subject to discussions with the vendors, it is our judgment that subcooling meters could be installed by April, 1980. In the interim, the operators have curves of saturation temperature versus reactor coolant pressure and have been instructed in using these curves.

c. New Instrumentation

As part of the work described in "a" above, the Westinghouse TMI Owners' Group is investigating additional instrumentation that may be of value in the definition and recognition of inadequate core cooling. This investigation, which will include a description of any new instrumentation or controls, the design requirements for such instrumentation, and a schedule for installation, will be provided consistent with the analysis of Item 2.1.9.

RESPONSE TO ITEM 2.1.4, DIVERSE CONTAINMENT ISOLATION

Each Cook Plant Unit has two levels of containment isolation identified as Phase A and Phase B. Phase A isolation closes all lines penetrating the containment except component cooling water to the reactor coolant pumps and service water to the ventilation units, which are closed on Phase B, and essential lines, such as Safety Injection and Containment Spray which are not isolated. Phase A isolation is initiated by containment pressure high (1.2 psig), safety injection initiation produced by any of various signals and by manual signals. The containment purge lines are automatically closed by a high radiation signal as well as the Phase A signals and by manual signals. Phase B isolation is automatically initiated by containment pressure high-high (3 psig) and by manual signals. Manual Phase B signals also isolate the containment purge lines. These initiating signals are all safety grade. This satisfies the requirement for diverse, safety grade actuating signals.

Both the Phase A and Phase B isolation signals can be reset manually. However, resetting either signal does not open any isolation valve. To open any valve, the individual valve's control switch must be turned manually to the closed position and then back to the open position. This feature satisfies the requirement that resetting a containment isolation signal does not open any containment isolation valve.

AEP is participating, through the Westinghouse TMI Owners' Group, in an identification of essential and non-essential systems. We will report the results of this study as they apply to Cook Plant and any resulting requirement for containment isolation system modifications by January 1, 1980.

RESPONSE TO ITEM 2.1.5.a, DEDICATED H₂ CONTROL PENETRATIONS

Cook Plant does not use external recombiners, nor does it have, as a design basis, a purge system for post-accident combustible gas control of the containment atmosphere.

Each Cook Plant Unit has two electric hydrogen recombiners inside the containment which are operable from the control room. Therefore, this item does not require a response for Cook Plant.

RESPONSE TO ITEM 2.1.5.c, REVIEW OF PROCEDURES AND BASES FOR ACTUATION OF THE ELECTRIC HYDROGEN RECOMBINERS

The two electric hydrogen recombiners per Unit, mentioned in Item 2.1.5.a, are located in the containment upper volume. The recombiners and their associated power and control cables are qualified for post-accident use inside containment and are operated from the control room.

The procedures for hydrogen sampling and recombiner actuation are undergoing review in light of the lessons learned during the TMI-2 accident. These procedures will be modified, if necessary, by January 1, 1980.

The shielding and personnel exposure limitations for operating the hydrogen monitoring system shall be performed as part of the shielding review of Item 2.1.6.b.

RESPONSE TO ITEM 2.1.6.a, SYSTEMS INTEGRITY FOR HIGH RADIOACTIVITY

Each train of the safety injection, containment spray, and residual heat removal systems has a permanently installed leakage alarm which alarms if the train leakage exceeds approximately 6 gpm. Floor drain piping in the auxiliary building has electrodes installed to alarm if the drain is passing water. This system assures that there are no significant undetected water leaks in the auxiliary building.

The gas pressures in the decay tanks and CVCS hold up tanks are checked each shift to check on the gas inventory. This procedure assures that there are no significant gas leaks.

The plant systems are being reviewed to identify all systems which might carry radioactive fluids following an accident. The Westinghouse TMI Owners' Group (of which AEP is a member) is performing a study to identify the functions of these systems and the fluids involved.

In the meantime to assure that all systems operate with essentially no leakage, AEP is devising leakage measurement methods. Leakage measurement methods will be established and the leakage of identified systems measured and reduced as necessary by April 1, 1980. The measured leakage values will be available for NRC inspection at the plant. A preventive maintenance program will be established at Cook Plant by April 1, 1980 to maintain leakage from these systems at minimum practicable levels. This program will include a verification of leakage, to the extent practical, during each refueling cycle interval.

RESPONSE TO ITEM 2.1.6.b, PLANT SHIELDING REVIEW

A radiation and shielding design review will be performed of the spaces around systems that may, as a result of an accident, contain highly radioactive materials. The shielding source term and radiation level guidance shall be as discussed by the NRC in the regional meetings on NUREG-0578 held the week of September 24, 1979.

The shielding design review shall be completed by January 1, 1980. The schedule for implementation of modifications, if required, will be determined after the design review is completed.

RESPONSE TO ITEM 2.1.7.a, AUTO INITIATION OF AUXILIARY FEEDWATER

The starting of the auxiliary feedwater system is automatic and all of the auxiliary feedwater system starting and control systems are safety grade. No further action is required.

RESPONSE TO ITEM 2.1.7.b, AUXILIARY FEED FLOW INDICATION

The AFW to each steam generator presently is metered and the flows are displayed in the control room. Each instrument channel is powered from a vital instrument bus. The present transmitters, located outside containment, are control grade and will maintain accuracy up to an ambient temperature of 160°F. The existing transmitters will be qualified or replaced with ones qualified to the outside containment requirements of IEEE-323-1974 by January 1, 1981.

RESPONSE TO ITEM 2.1.8.a, POST-ACCIDENT SAMPLING

The design review of the post-accident sampling system for Cook Plant has been started. We are currently preparing a work scope package for an outside contractor to assist us in completing the review. Our review will cover sampling points and sample collection, transport and analyses. We are requesting the contractors to complete the work so we can report our findings to the NRC by April 1, 1980. Our report will include a conceptual description of any proposed modifications and an identification of any items for which the NRC criteria cannot be met.

AEP is a member of the Westinghouse TMI Owners' Group. The Owners' Group has authorized the Westinghouse Electric Corporation to develop recommended sample analysis procedures. These are scheduled for completion by the end of November. We will use these procedures as appropriate in the design of the sampling system modifications.

The requirements for obtaining and analyzing highly radioactive samples within a short time period after a major accident need further definition. It would be valuable to learn the experiences of those persons who were directly involved with sample collection and analysis at TMI-2 during the accident. This information would be a useful supplement to the discussion in NUREG-0578. We understand from the regional meetings on NUREG-0578 that the NRC is requiring an onsite counting facility with spectral analysis capability and chemical analysis (boron/chloride) capability for highly radioactive samples. Our review of the design and operation of such a facility, as compared to the feasibility of analyzing samples offsite, would benefit from a topical meeting with the NRC and others experienced in this area.

Our report to you by April 1, 1980 will give a date by which we will be able to implement any plant modifications required for post-accident sampling.

RESPONSE TO ITEM 2.1.8.b, HIGH RANGE RADIATION MONITORS

Procedures shall be developed and implemented by January 1, 1980 to estimate noble gas and radioiodine release rates in the event the existing instrumentation goes off scale.

High range noble gas, radioiodine and particulate effluent monitors shall be installed by January 1, 1981 to meet the requirements prescribed by NUREG-0578. High range containment radiation monitors shall be installed by January 1981 to meet the NUREG-0578 requirements.

Procedures for determining airborne iodine concentration shall be developed and implemented by January 1, 1980. Spectrum analysis equipment shall be procured and installed specifically for this purpose. Existing spectrum analyses equipment shall be used to perform the above determination until the dedicated system is received and installed.

RESPONSE TO ITEM 2.1.8.c, IMPROVED IODINE INSTRUMENTATION

Portable sampling equipment and spectral analysis instrumentation will be provided to measure iodine in plant areas requiring post-accident access. This equipment will be ordered for anticipated delivery to the site by January 1, 1980.

RESPONSE TO ITEM 2.1.9, TRANSIENT AND ACCIDENT ANALYSIS

1. Small Break LOCA

Small break LOCA analysis has been performed for the Westinghouse TMI Owners' Group of which AEP is a member. The analysis results are reported in WCAP-9600 "Report on Small Break Accidents for Westinghouse NSSS Systems" which was submitted to the NRC on June 29, 1979. The analysis has been further discussed in the Owners' Group responses to numerous NRC requests for additional information. As of the present date, all NRC concerns have been addressed.

AEP is reviewing the emergency procedure guidelines which were generated from this analysis. AEP participated in a meeting with Westinghouse on October 16-19 to review these guidelines. Based on these guidelines, AEP will implement the appropriate emergency procedures for Cook Plant and will institute the appropriate operator instruction and training. The procedures will be in place and the operator retraining in this matter will be completed at the Cook Plant by January 1, 1980.

2. Inadequate Core Cooling

Inadequate core cooling analysis is being performed by Westinghouse for the Owners' Group. A preliminary analysis will be submitted to the NRC by October 31, 1979 as required by the NRC Bulletins and Orders Task Force. This will include analyses related to the definition of inadequate core cooling and guidelines for recognizing the symptoms of inadequate core cooling based on existing plant instrumentation and recovery from such a condition.

AEP will review the emergency procedure guidelines generated from this analysis and, upon receipt, will start incorporating the guidelines into plant procedures as necessary, and will start training the shift operating personnel with the intent of meeting the required date of January 1, 1980.

Should this analysis or further work to better define the approaches to inadequate core cooling show the need for additional instrumentation, we will notify the NRC and provide a schedule for implementation of any instrumentation for which a need is identified.

3. Other Accident and Transient Analysis

Analysis of other accident and transient analysis scenarios not previously studied is being performed on a generic basis by the Owners' Group in conjunction with the NRC Bulletins and Orders Task Force. The scope of the work includes identification of operator actions associated with important safety considerations during off-normal conditions. The analysis results are expected to be submitted to the NRC by January 1, 1980.

AEP will review the resulting emergency procedure guidelines and implement appropriate procedures and retraining three months after the guidelines are established.

4. LOFT Small Break Pre-Test Calculation

Pre-test calculations of the LOFT Small Break Test will be performed by Westinghouse for the Owners' Group and submitted to the NRC prior to the test which is presently scheduled for November 15, 1979.

RESPONSE TO ACRS ITEM, CONTAINMENT PRESSURE MONITOR

Each Cook Nuclear Plant Unit currently has four pressure transmitters connected to the containment upper volume for indication and alarm. These are safety grade instrument channels. The span of two of these transmitters will be increased to a range of -5 psig to 36 psig by January 1, 1980.

RESPONSE TO ACRS ITEM, CONTAINMENT WATER LEVEL MONITOR

Each Cook Nuclear Plant Unit presently has control grade water level indication which covers the span from the bottom of the recirculation sump to the equivalent of approximately 180,000 gallons.

New instrumentation meeting the requirements of Regulatory Guide 1.97, if practical, and covering the span from the bottom to the top of the sump with one set, and from the top of the sump to the equivalent of 500,000 gallons with a second set (refueling water storage tank capacity), will be installed by January 1, 1981.

RESPONSE TO ACRS ITEM, CONTAINMENT HYDROGEN MONITOR

New hydrogen analyzing equipment meeting the requirements of Regulatory Guide 1.97, if practical, and covering the range of 0 to 10% hydrogen will be installed by January 1, 1981.

RESPONSE TO ACRS ITEM, REACTOR COOLANT SYSTEM VENTING

Remote-operated vent valves will be provided for the reactor vessel head and the pressurizer vapor space by January 1, 1981. The proposed design will be submitted to the NRC for review by January 1, 1980.

RESPONSE TO ITEM 2.2.1.a, SHIFT SUPERVISOR RESPONSIBILITIES

The position description of the Shift Supervisor spells out his management responsibility for safe operation of the plant under all conditions on his shift. This primary management responsibility, with clearly established command duties, will be re-emphasized in a written directive to be issued by Indiana and Michigan Power Company corporate management.

The issuance of the management directive, the review and revision of plant procedures to meet the intent of the directive, and the required training program of the shift supervisors shall be implemented prior to January 1, 1980.

RESPONSE TO ITEM 2.2.1.b, SHIFT TECHNICAL ADVISOR (STA)

Indiana and Michigan Power Company will implement the two STA functions, Operating Experience Evaluation and Safety Monitoring, in the following manner:

Operating Experience Evaluation:

The responsibility to perform this function will be assigned to a single individual, normally on the day shift, and performed by engineers in appropriate disciplines. The function will be performed at the DCCNP and coordinated with personnel performing the STA safety monitoring function. The organization and procedures for performance of this function will be in place prior to January 1, 1980.

Safety Monitoring Function:

The safety monitoring function of the STA will be implemented prior to January 1, 1980; training to upgrade the performance of this function will be provided, as further described, on a timely and ongoing basis. Beginning in January of 1980, one of DCCNP's two SRO's, on shift, will be assigned the Control Room Safety Monitoring function. These SRO's will normally perform their present duties, and in the event of an incident a previously designated SRO will be dedicated to the safety monitoring function. Upgraded operational training will be developed and provided to these and all licensed operating personnel as soon as possible. With the intention of meeting the January 1981 objectives of the STA, Indiana and Michigan Power Company will also develop and provide training to upgrade the technical and operational knowledge of plant staff personnel.

Beginning in January of 1981 these on-call STA personnel will:

1. At no time be more than 45 minutes away from the plant,
2. Be provided with a vehicle equipped with communications to the control room, for en-route updating.

The on-call STA will be an integral part of the operating experience review process.

RESPONSE TO ITEM 2.2.1.c, SHIFT AND RELIEF TURNOVER PROCEDURES

We are in the process of reviewing our current shift and relief turnover procedures. The procedures will be revised as necessary to reflect the intent of NUREG-0578. Implementation will be completed by January 1, 1980.

RESPONSE TO ITEM 2.2.2.a, CONTROL ROOM ACCESS CONTROL

In accordance with the NUREG-0578 position, procedures will be implemented by January 1, 1980 for limiting personnel access to the control room under emergency situations.

RESPONSE TO ITEM 2.2.2.b, TECHNICAL SUPPORT CENTER

An interim technical support center will be established by January 1, 1980. This center will include the staffing, communications, and reference material necessary for support during an emergency. The Westinghouse TMI Owners' Group is reviewing the basis for display of plant data, methods of displaying the data and investigating communications needs. The extent of instrumentation which can be displayed on an interim basis by January 1, 1980 is under evaluation.

RESPONSE TO ITEM 2.2.2.c, OPERATIONAL SUPPORT CENTER

An operational support center will be implemented by January 1, 1980. This center will provide a manpower pool for control room and technical support center activities as well as a reporting area for personnel arriving from offsite.

RESPONSE TO ENCLOSURES 7 AND 8 NEAR TERM REQUIREMENTS FOR IMPROVING
EMERGENCY PREPAREDNESS

- Item 1 Upgrade emergency plans to Regulatory Guide 1.101 with special attention to action level criteria based on plant parameters.

RESPONSE

The Donald C. Cook Nuclear Plant's Emergency Response Plan conforms to the guidelines of Regulatory Guide 1.101. By mid-1980, the Plan will be upgraded with special attention to action level criteria based on plant parameters and to be consistent with the emergency action levels of the State of Michigan's Peacetime Nuclear Incident Rules.

- Item 2 Implement certain short term actions recommended by Lessons Learned Task Force and use these in action level criteria:

- 2.1.8 (a) Post Accident Sampling
- 2.1.8 (b) High Range Radioactivity Monitors
- 2.1.8 (c) Improved In-Plant Iodine Instruments
- 2.1.3 (b) Detection for Inadequate Core Cooling

RESPONSE

Upon implementation and installation of the upgraded systems for measuring radioactivity during an accident condition as described in our response to NUREG-0578 items 2.1.8 (a), (b) and (c) and 2.1.3 (b), procedures for relating values obtained from these systems will be incorporated into Chapter 12 of the FSAR or in Cook Plant Emergency Plan Procedures, as appropriate.

- Item 3 Establish Emergency Operations Center (EOC) for Federal State and Local Officials
- (a) Designate location and alternate location and provide communications to the Plant.
 - (b) Upgrade Emergency Operations Center in conjunction with in-plant technical support center.

RESPONSE

- (a) The Cook Plant EOC and a designated alternate location will be established with suitable communications capability by mid-1980.
- (b) The Cook Plant EOC only will be upgraded in conjunction with the onsite technical support center to have the required communications capability, decisional aids and required plant technical data by January 1, 1981. It is not intended to provide real time operational data at this center in addition to providing in the onsite technical support center.

Item 4

Improve offsite monitoring capability.

RESPONSE

Offsite monitoring improvements as indicated in Section III.A.2 of the Emergency Planning Review Guideline Number One, Revision One, dated September 7, 1979, are described in revised Technical Position (TP) issued by the NRC Radiological Assessment Branch for the Environmental Radiological Monitoring Program. This TP is currently in draft format and has not been approved in scope by the NRC. In order to ensure that an upgraded off-site monitoring program is consistent with the objectives of the staff reviews, the NRC should issue approved requirements for this program. In the absence of an approved program, AEP will review the draft TP and submit a proposal to improve offsite monitoring capability with a goal of implementation by mid-1980.

Item 5

Assure adequacy of State/Local plans.

- (a) Against current criteria.
- (b) Against upgraded criteria.

RESPONSE

It is our understanding that the NRC's Office of State Programs will review and approve State/Local plans in accordance with criteria agreed upon by State Governments, i.e., NUREG 75/111. It is our intention to provide guidance to State/Local agencies in the formulation and upgrading of State/Local plans. However, the licensee is not in a position to enforce "new" or upgraded concepts that may be contrary to State/Local laws, plans, policy, etc.

RESPONSE

The primary responsibility for coping with an emergency situation in areas offsite from the licensee's facility rests with the State/Local governing body. Furthermore, the State of Michigan has directed nuclear facility owners (via the Michigan Peacetime Nuclear Incident Rules Nos. R325.5901 through R325.5934) to provide for a "plant emergency plan that shall conform to the Michigan nuclear facility emergency plan....as an acceptable plan by the department" (of public health). Therefore, AEP has been directed by the State of Michigan via these Rules to provide for a plan that conforms to the State's plan and does not provide the licensee the option of assuring that the State/Local plan agrees with required criteria of the NRC. In areas where the licensee's plan will not conflict with State/Local plans, policy, laws, responsibilities, etc., the licensee will "bridge the gap" to ensure adequate coverage to improved criteria. AEP is willing to work with the state and local authorities so that by the NRC's required implementation dates, all three plans-- local, state and licensee's -- are consistent, understandable to all three parties and effective in providing the necessary offsite emergency actions.

Item 6

Conduct test exercises (federal, state, local, licensee).

- (a) Test of licensees emergency plan.
- (b) Test of state emergency plan.
- (c) Joint test exercise of emergency plans within 5 years (federal, state, local, licensee)

RESPONSE

AEP will commit to the participation in tests of emergency plans as described above. AEP will test its emergency plan before mid-1980 (item a). AEP will cooperate with the state authorities as requested by them in their test of the state emergency plan (item b). AEP will cooperate with the agencies involved to conduct a joint test exercise of the emergency plans within 5 years (item c).