

# INDIANA & MICHIGAN ELECTRIC COMPANY

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

October 22, 1980  
AEP:NRC:00475

ATTACHMENT CONTAINS  
10 CFR 2.790 (d) INFORMATION

Donald C. Cook Nuclear Plant Units Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
IE Report Nos. 50-315/80-14 and 50-316/80-13

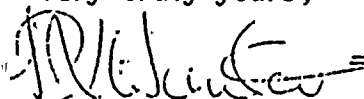
Mr. James G. Keppler, Regional Director  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region III  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter and its attachment respond to Mr. J. A. Hind's letter of September 11, 1980 which we received on September 18, 1980. Mr. Hind's letter transmitted to us IE Reports No. 50-315/80-14 and No. 50-316/80-13 containing 10 CFR Part 2.790 (d) Information. A two week extension until October 22, 1980 was requested by telephone for our response due October 8, 1980. The request was granted by Mr. T. Madaed of your office.

The attachment to this letter is our explanation for the activities which appear to be in non-compliance with NRC requirements and includes for each item requiring a response (1) the corrective action and results achieved, if applicable; (2) actions taken to avoid future non-compliance; and, (3) the date of new compliance for corrected items as appropriate. The attachment which contains this information is considered proprietary, and it is requested that it be withheld from public disclosure, in accordance with 10 CFR 2.90, and that it not be placed in the Public Document Room.

Very truly yours,

  
R. S. Hunter  
Vice President

cc: attached

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10 CFR 2.790 (d) INFORMATION

OCT 27 1980

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Mr. James G. Keppler

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AEP:NRC:00475

cc: R. C. Callen  
G. Charnoff  
John E. Dolan  
R. W. Jurgensen  
D. V. Shaller - Bridgman  
Region III NRC Resident Inspector - Bridgman



Response to Item 1

1. We have transmitted a letter to all contractors requiring that the clearance letters transmitted to the plant for their employees, who require authorized access without escort, more properly address the commitments of our MASP and contain statements to the effect that:
  - a) an employment record check had been conducted,
  - b) no adverse character traits had been discovered for the individual in question and,
  - c) that the person is considered to be reliable and trustworthy.
2. We believe the action in Step 1 above will adequately address the NRC concerns in this area. To prevent future non-compliance in this area, the DCCNP Security Department will perform spot checks from time to time of contractor screening records.
3. We have taken the actions indicated in Items 1 and 2 above; however, some of the Union Business Agents have declined to respond directly to our request without further discussion with their legal counsel. In general, we believe most of the contractors and unions supplying Craft employees to work at DCCNP have been in compliance with the intent of the commitments made in the plants' Modified Amended Security Plan to meet NRC requirements, even though the explicit wording of their reference letters does not strictly conform to the wording used in our letter ("Security Directive") to them which stated the screening criteria for authorized unescorted access to our facility. We are currently expecting to hear from the Union Business Agents shortly after they have concluded their discussion with legal counsel. At that time we will advise you of the steps being taken to achieve full compliance and the expected date of full compliance.

Response to Item 3

1. To prevent further non-compliance, in areas where dune grass grows on sloping surfaces of the exterior isolation zone and which cannot be cut due to erosion, a change will be made to the MASP to address this situation under "Exceptions to the Exterior Isolation Area Clear Zones." We believe this change will not degrade security, in that, intruders attempting to gain access through isolation zones, where sloping areas exist, can be seen and detected.



2. The MASP change has been generated and is undergoing procedural reviews and approval. Once the MASP change is approved, it will be submitted to the NRC within sixty days following its incorporation into MASP, in accordance with 10 CFR 50.54(p).

Item 2 of Appendix A to Mr. Hind's letter did not require an answer.

