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 50-315/88-05 & 50-316/88-06. Withheld (ref 10CFR73.21).

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INDIANA & MICHIGAN ELECTRIC COMPANY

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COLUMBUS, OHIO 43216

AEP:NRC:0846AI

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC INSPECTION REPORT NOS. 50-315/88005 (DRS)
AND 50-316/88006 (DRS)

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: T. E. Murley

March 18, 1988

Dear Dr. Murley:

This letter is in response to the special safeguards inspection conducted January 19-20, 1988 by Mr. T. J. Madeda, Region III, NMSS. The Notice of Violation identifies one Level IV violation which is addressed in the attachment to this letter. In addition, the attachment outlines a comprehensive and effective corrective action program.

As this attached information involves a subject matter which is exempt from disclosure to 10 CFR 73.21(c)(2), it is requested that the attached material be withheld from public disclosure and not placed in the NRC Public Document Room.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Please acknowledge receipt of the attached Safeguards Information by signing and returning the enclosed Form SI-3, Certificate of Receipt for Document Transmittal, to M. J. Jury, Nuclear

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Dr. T. E. Murley

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Operations Division, American Electric Power Service Corporation
1 Riverside Plaza, Columbus, Ohio 43216.

Sincerely,



M. P. Alexich
Vice President

cm

Enclosure

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Dr. T. E. Murley

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ATTACHMENT 1 TO AEP:NRC:0846AI
RESPONSE TO VIOLATION

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NRC VIOLATION

Inspection results verified the failure to adequately perform required compensatory measures for a degraded section of a protected area intrusion alarm zone. This failure constituted a violation of the licensee's Security Plan. A similar instance occurred and was labeled a "licensee identified" violation during our last security inspection, which was conducted on December 7-10, 1987. Current inspection results showed that the corrective action for the previous violation was not fully effective. Licensee management agreed with the facts presented by the inspector concerning this item. The licensee has already taken immediate corrective actions and is considering additional measures to address the violation and to prevent recurrence. This is a Severity IV violation.

RESPONSE TO NRC VIOLATION

Indiana Michigan Power Company admits to the violation.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

1. A post previously located outside of the protected area fence (Post 28) was moved inside the protected area. This move enables personnel manning the post to visually observe the second post (Post 27) also located in the protected area.
2. Ten minute radio or observation checks between Post 27 and Post 28 are conducted and Central Alarm Station (CAS) monitors the radio checks.
3. Post 27 and Post 28 rotate assigned personnel each half-hour. CAS assures rotation is completed by radio checks.
4. Post 27 and Post 28 are checked at least hourly by a supervisor.
5. Training emphasizing individual responsibilities to remain alert was completed on 1-29-88 for all security force members except those on medical leave. Those on medical leave were trained prior to resuming duties. Training for all personnel was completed on 3-7-88.

No further violations have occurred as of this date with the implementation of the above corrective actions.

CORRECTIVE ACTION TO AVOID FURTHER VIOLATION

1. The security officer found asleep on post in the latest incident has been placed on written reprimand and attention to duty.



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2. A program designed to assure that security personnel are attentive to duty is outlined in this letter.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on discovery of the inattentive security officer, in that the discovering security officer assumed responsibility for the post. Those items outlined in the referenced program discussed below, will be fully implemented by December 31, 1988.

PROGRAM

The following program has been developed to provide reasonable assurance to site management that security personnel maintain an alert and attentive posture during the course of their duties. The following items with proposed corrective actions have been identified as root causes contributing to past incidents of inattention to duty:

1. Attitude Towards Individual Responsibility

Goal 1.1

Develop by June 1, 1988, a method to improve the pre-screening process for the selection of security officers.

Action Item 1.1.a

Administer a professional questionnaire to all prospective members of the security force as part of the pre-screening process to assist in determining attitude. Administering the questionnaire began February 16, 1988.

Goal 1.2

Develop by June 1, 1988, methods to assure all security personnel are informed and are aware of the significance of their assigned responsibilities.

Action Item 1.2.a

Assure each employee of the security force is aware of their individual responsibility to remain mentally and physically fit to perform duties by issuing individual copies of the Contract Security's Fitness for Duty Handbook. This was started on March 1, 1988.

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Action Item 1.2.b

Training emphasizing individual responsibility to remain alert has been conducted for all existing security officers. The same training will be given during all subsequent training classes for new hires. This training will be incorporated into security lesson plans by June 1, 1988.

2. Insufficient Consideration to Human Factors

Goal 2.1

Establish a mechanism to evaluate compensatory measures each time a reduction occurs in the effectiveness of a required security system.

Action Item 2.1.a

Evaluations of each Security post requiring compensatory measures is being conducted. Formal evaluation criteria for compensatory posts and a method of documentation of such evaluations will be established by June 1, 1988.

Goal 2.2

Assure contract security officers are fit for duty prior to assuming post duties.

Action Item 2.2.a

Continue fitness for duty evaluations of security officers through supervisory visual observation or other methods deemed necessary to determine fitness for duty prior to beginning shift assignments.

3. Contract Supervision Effectiveness

Goal 3.1

Ensure contract security supervisors are aware of their responsibilities and are trained accordingly.

Action Item 3.1.a

The security contractor shall administer a professional supervisory aptitude test (Hezel Test) to all existing and prospective supervisors by September 30, 1988. The test is

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expected to point out supervisor strengths and weaknesses to assist in determining individual and generic performance improvement programs.

Action Item 3.1.b

The Cook Plant Training Department conducted a one-week Basics of Supervision Class for all contract security Captains, Training Instructors and the Site Manager. This class was completed February 19, 1988.

Action Item 3.1.c

A contract compliance audit has been performed by the Security contractor concentrating on supervisor functions, supervisor training, supervisor selection and evaluation process, morale, individual development planning, communications and overall strengths and weaknesses. This audit was completed February 12, 1988.

Action Item 3.1.d

A supervisory course (consisting of approximately twenty-four classroom hours) shall be conducted for all contract security supervisors. The course shall be completed by December 31, 1988.

Action Item 3.1.e

A problem solving meeting relative to inattention to duty was held with contract security Captains, Training Instructors, Site Manager and I&M Security staff on January 22, 1988. Emphasis was placed on determining root causes for the incidents and corrective action measures to prevent recurrence.

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