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 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 800229 ltr re violations noted in Insp Repts
 50-315/80-09 & 50-316/80-08.

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**INDIANA
MICHIGAN
POWER**

AEP:NRG:0435A

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RADIOACTIVE MATERIAL PLACARDING

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

ATTN: A. B. Davis

December 12, 1989

Dear Mr. Davis:

In response to NRC Inspection Report 50-315/80-09; 50-316/80-08, dated February 29, 1980, we committed to several corrective actions with regard to the transport of radioactive waste from the Donald C. Cook Nuclear Plant. These actions concern placarding transport vehicles and packages (640 cubic feet in volume or larger) carrying radioactive material shipments.

The placarding requirements committed to in response to the inspection report extend beyond the scope of 49 CFR 172.504. We would like to revise our previous commitment such that placarding is performed in accordance with 49 CFR 172.504.

The attachment to this letter describes the current procedures for placarding radioactive material shipments, the procedures we wish to adopt, and our justification for the change.

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

Sincerely,

M. P. Alexich
Vice President

edg

Attachment

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
NFEM Section Chief
NRC Inspector - Bridgman

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PDR ADOCK 05000315
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ATTACHMENT

TO

AEP:NRC:0435A

Currently, the Donald C. Cook Nuclear Plant placards certain radioactive material shipments in excess of the applicable transportation regulations. This commitment and procedural requirement is based on our response to a Notice of Violation dated February 29, 1980. In our response to the Notice of Violation, we committed to extend the placarding requirements of 49 CFR 172.504 to include radioactive material packages greater than 640 cubic feet in volume, although these requirements are actually applicable only to transport vehicles and freight containers. Packages used for shipment of low specific activity (LSA) material are subject only to the marking requirements of 49 CFR 173.425 (which do not include a requirement to placard the package). For radioactive material shipments via truck, placards are currently placed on each end and both sides of the trailer, on the front of the tractor, and if the package(s) is greater than 640 cubic feet in volume, it is also placarded on all four sides.

NRC Notice of Violation, Docket Nos. 50-315 and 50-316, was based on an inspection, conducted February 29, 1980, of three shipments containing radioactive waste from the Donald C. Cook Nuclear Plant upon arrival at the Nuclear Engineering Company, Beatty, Nevada facility. This Notice of Violation cites the requirements of the Department of Transportation for placarding each end and side of exclusive use vehicles transporting Low Specific Activity (LSA) material (paragraphs 49 CFR 172.504, 172.506, and 173.392(c)(7)). The notice of violation states: "Contrary to the above, on February 29, 1980, three exclusive use trucks carrying large boxes of LSA material from the D. C. Cook Nuclear Plant to the Nuclear Engineering Company, Beatty, Nevada, were found upon arrival to be missing the front placard."

The cited violation is directed towards the placarding of the transport vehicle versus labelling of the boxes of LSA material. In view of this we consider that the commitment made in our original response to the Notice of Violation was overly restrictive. We would like to change our procedure to require placarding in accordance with 49 CFR 172.504 in order to eliminate current procedural requirements for placarding packages that exceed those imposed by the transportation regulations.

We request our commitment of placarding both the transport vehicle and package (if larger than 640 cubic feet in volume) to be changed to placarding only the transport vehicle. The transport vehicle would be placarded on both sides, both ends, and on the front of the tractor in accordance with 49 CFR 172.504. The package would be labelled in accordance with 49 CFR 173.425.

