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SUBJECT: Responds to Generic Ltr 90-01, "NRC Regulatory Impact Survey."

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AEP:NRC:1122
GL 90-01

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO GENERIC LETTER 90-01: NRC REGULATORY
IMPACT SURVEY, GENERIC LETTER 90-01

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

Attn: T. E. Murley

March 30, 1990

Dear Dr. Murley:

We have elected to participate in the NRC Regulatory Impact Survey as requested in Generic Letter (GL) 90-01. Our responses to the survey are contained in the attachment.

It should be noted that we have only responded to inspection, audits or evaluations, imposed on us and conducted by an outside agency. This policy was recommended by the additional clarification information provided to us by the Nuclear Management and Resource Council (NUMARC). We also note that this additional guidance was not received until February 20, 1990, which is the reason for our later than desired March 1, 1990, submittal date.

We are pleased to participate in this survey or any other program to enhance the overall safe operation of nuclear power plants in general. The number of manhours we have attributed to each activity is as realistic as possible but only a rough estimate given that we do not normally document individual manhours expended on inspection or audit activities.

Sincerely,

M. P. Alexich
Vice President

ldp

Attachment

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Dr. T. E. Murley

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AEP:NRC:1122

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

ATTACHMENT TO AEP:NRC:1122

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC RESIDENTS, REGIONAL AND HEADQUARTERS INSPECTIONS (SPECIAL AND ROUTINE)
2. Based on actual experience over the past several years, about how often is this activity conducted? APPROXIMATELY FIVE INSPECTIONS PER YEAR.
THE RESIDENT'S INSEPCIONS ARE CONTINUOUS WITH MONTHLY INSPECTION REPORTS ISSUED.
3. Operations/Construction areas covered: ALL AREAS OF PLANT OPERATIONS.
4. Extent of the activity (how many people, for how long) TWO RESIDENT INSPECTORS CONTINUOUS, OTHERS ARE ONE TO FOUR INSPECTORS FOR TWO TO FIVE DAYS PER INSPECTION.
5. ^{MANHOURS} Approximate ~~percentage~~ of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 1045 (number involved) 13
 - b. Plant Manager 556 (includes assistant plant managers)
 - c. Corporate Department Heads 242 (number involved) 6
 - d. Corporate Vice Presidents 44 (number involved) 2
 - e. Chief Nuclear Officer 80
 - f. Managers & Supervisors 1060 (number involved) 13

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC TEAM INSPECTIONS

2. Based on actual experience over the past several years, about how often is this activity conducted? APPROXIMATELY TWO PER YEAR

3. Operations/Construction areas covered: APPENDIX R SAFE SHUTDOWN PROCEDURES, EQUIPMENT ENVIRONMENTAL QUALIFICATION, HEALTH PHYSICS, EMERGENCY OPERATING PROCEDURES, AND PLANT MAINTENANCE.

4. Extent of the activity (how many people, for how long) APPROXIMATELY FIVE TO EIGHT INSPECTORS FOR ONE TO TWO WEEKS.

5.

MANHOURS

Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
- a. Plant Department Heads 678 (number involved) 8
- b. Plant Manager 126 (includes assistant plant managers)
- c. Corporate Department Heads 17 (number involved) 3
- d. Corporate Vice Presidents 121 (number involved) 3
- e. Chief Nuclear Officer 40
- f. Managers & Supervisors 912 (number involved) 10

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO ANNUAL EVALUATION

2. Based on actual experience over the past several years, about how often is this activity conducted? ONCE PER YEAR.

3. Operations/Construction areas covered: ALL AREAS OF PLANT OPERATIONS, MAINTENANCE, AND TECHNICAL SUPPORT. OPERATOR AND TECHNICAL STAFF TRAINING.

4. Extent of the activity (how many people, for how long) TWENTY TO TWENTY-FIVE EVALUATORS FOR TWO WEEKS.

5.

MANHOURS

Approximate ~~percentage~~ of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 902 (number involved) 14
 - b. Plant Manager 288 (includes assistant plant managers)
 - c. Corporate Department Heads 70 (number involved) 2
 - d. Corporate Vice Presidents 164 (number involved) 4
 - e. Chief Nuclear Officer 35
 - f. Managers & Supervisors 3226 (number involved) 22



Country	1950	1960	1970	1980	1990
Japan	10.5	12.5	14.5	16.5	18.5
Germany	10.0	11.5	13.0	14.5	16.0
Italy	9.5	11.0	12.5	14.0	15.5
France	9.0	10.5	12.0	13.5	15.0
Canada	8.5	9.5	10.5	11.5	12.5
Sweden	8.0	9.0	10.0	11.0	12.0
U.S.	7.5	8.5	9.5	10.5	11.5

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: ANI INSPECTIONS

2. Based on actual experience over the past several years, about how often is this activity conducted? TWICE PER YEAR.

3. Operations/Construction areas covered: FIRE PROTECTION AND ALL AREAS
OF PLANT OPERATION.

4. Extent of the activity (how many people, for how long) TWO TO THREE
INSPECTORS FOR FOUR TO FIVE DAYS.

5. Approximate ^{MANHOURS}~~percentage~~ of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 62 (number involved) 5
 - b. Plant Manager 19 (includes assistant plant managers)
 - c. Corporate Department Heads 8 (number involved) 1
 - d. Corporate Vice Presidents 16 (number involved) 1
 - e. Chief Nuclear Officer 8
 - f. Managers & Supervisors 321 (number involved) 6

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: GOVERNMENTAL (i.e., LOCAL
STATE, EPA, EMERGENCY PLAN EXERCISE..
2. Based on actual experience over the past several years, about how often
is this activity conducted? CONTINUOUS - TEN TO FIFTEEN PER YEAR.
3. Operations/Construction areas covered: EMERGENCY PLANS AND EXERCISES,
OSHA, BOILER INSPECTIONS, RADIOLOGICAL PROTECTION, ENVIRONMENTAL PROTECTION
AGENCY, ETC. THIS IS A CATCH-ALL CATEGORY.
4. Extent of the activity (how many people, for how long) ONE TO SIX,
DEPENDING ON THE SPECIFIC ACTIVITY.
5.

MANHOURS

Approximate ~~percentage~~ of total time (on an annual basis) which the
following managers must spend in direct involvement before, during, and
in response to the activity described in Item #1.
 - a. Plant Department Heads 356 (number involved) 7
 - b. Plant Manager 157 (includes assistant plant managers)
 - c. Corporate Department Heads 16 (number involved) 2
 - d. Corporate Vice Presidents 104 (number involved) 1
 - e. Chief Nuclear Officer 80
 - f. Managers & Supervisors 995 (number involved) 12

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