

# INDIANA & MICHIGAN ELECTRIC COMPANY

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

August 7, 1981  
AEP:NRC:00598

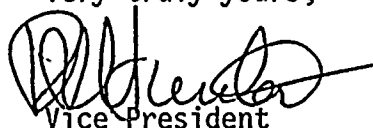
Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
IE REPORTS NO. 50-315/81-12 AND NO. 50-316/81-15

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 attachments provide our response to Mr. C. E. Norelius' letter of July 8, 1981 requesting a response to the two Severity Level VI violations cited in IE Inspection Reports No. 50-315/81-12 and No. 50-316/81-15. The items contained in the Notice of Violation involving radiological posting conditions are addressed in Attachment 1 to this letter. We have clarified the use of the words "dose rate maps" (used in Item 12 of the "Details" Section of the Inspection Report) in Attachment 2 to this letter.

Very truly yours,



Vice President

## Attachments

cc: John E. Dolan - Columbus  
R. C. Callen  
G. Charnoff  
R. W. Jurgensen  
D. V. Shaller - Bridgman  
Joe Williams, Jr.  
Region III Resident Inspector - Bridgman

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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

State of New York )  
County of New York )

R. S. Hunter being duly sworn, deposes and says that he is the Vice President of Licensee Indiana & Michigan Electric Company, that he has read the foregoing response to the Notice of Violation contained in IE Inspection Reports No. 50-315/81-12 and No. 50-316/81-15 and knows the contents thereof; and that said contents are true to the best of his knowledge and belief.

R. S. Hunter

Subscribed and sworn to before me this 7<sup>th</sup> day of August, 1981.

Kathleen Barry  
(Notary Public)

KATHLEEN BARRY  
NOTARY PUBLIC, State of New York  
No. 41-4606792  
Qualified in Queens County  
Certificate filed in New York County  
Commission expires March 30, 1983



ATTACHMENT 1 TO AEP:NRC:00598

DONALD C. COOK NUCLEAR PLANT

IE INSPECTION REPORTS NO. IE 50-315/81-12 AND NO. 50-316/81-15

1. Response to Item 1.

A formal distribution of PMS0.006 which states that the regulations, licenses, and procedures are on file for examination in the plant library and/or plant master file and which has been updated to include the Unit 2 license number, and copies of the updated form NRC-3, has been established through Plant Document Control Office using the Document Issue Record System. Locations designated for posting include the Security Control Center, the Access Control Points, and other locations in the plant. A new revision of PMS0.006 (revision 3), dated June 16, 1981, and a current copy of NRC-3 were distributed for posting on June 26, 1981.

To insure that the postings remain in place and that the most current forms are posted, the Quality Assurance Department will conduct periodic inspections consistent with the Quality Assurance Surveillance Program of all assigned posting locations to verify that the most current form of each required document is prominently displayed at each location.

2. Response to Item 2.

The Notice of Violation contained in the Inspection Report dated May 26, 1981, has been posted at the same locations noted in Item 1 above. Future notices requiring posting shall be distributed through Document Control as referenced above.

In order to facilitate identifying those notices requiring posting, a change has been made to form PMS0.052 (Attachment 1 to PMS0.052) of the NRC Document Processing Form, which requires the Plant Manager or his alternate to verify whether the subject document fulfills any of the following conditions:

- a) Contains a requirement imposed by order of the NRC.
- b) Involves modification, suspension, or revocation of a NRC license.
- c) Contains a Notice of Violation involving radiological working conditions.
- d) Proposes the imposition of civil penalties.



Whenever any NRC document fulfills any of the conditions listed above, the appropriate information for posting will be routed to Document Control for posting distribution.

In like manner, responses to these items will be routed to Document Control for posting. These notices will be marked "To Be Removed By Authorized Personnel" and will remain posted until it is determined by Plant Management that the notices may be removed.

The response to the actions correcting the violation of the use of friskers and the absence of them at certain locations was given in Mr. R. S. Hunter's letter to Mr. Keppler dated July 30, 1981 which responded to IE Inspection Report No. 50-315/80-23 and No. 50-316/80-19 (AEP:NRC:0579).





ATTACHMENT 2 TO AEP:NRC:00598

DONALD C. COOK NUCLEAR PLANT

IE INSPECTION REPORTS NO. IE 50-315/81-12 AND NO. 50-316/81-15

There appears to be some confusion as to the terminology of "dose rate maps" submitted as part of a shielding study required by NUREG 0578. Section 2.1.6.b of NUREG 0578 required each licensee to perform a radiation and shielding design review of the spaces around systems that may, as a result of an accident, contain highly radioactive material. The shielding design review report was finalized and transmitted to the plant on December 10, 1980. The term "dose rate maps" appears to have been formulated in the NRC's evaluation of the shielding design review (AEP:NRC:0405) dated March 20, 1980. The preparation of "maps" relative to the shielding design review is not considered necessary as the required information is already contained in the above-mentioned report.