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SUBJECT: Forwards rev 16 to plant emergency plan, incorporating changes related to relocation of emergency operations facility from St Joseph district svc center in Benton Township, MI to Buchanan, MI.

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March 2, 1998

AEP:NRC:0824Q

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
EMERGENCY PLAN, REVISION 16

Attached is revision 16 to Cook Nuclear Plant's emergency plan. This revision incorporates changes to our emergency plan related to the relocation of our emergency operations facility from the St. Joseph district service center in Benton Township, Michigan, to the nuclear generation group headquarters in Buchanan, Michigan.

Attachment 1 contains an assessment of acceptability as suggested by the Nuclear Energy Institute. Based on the assessment, we have concluded these changes do not decrease the effectiveness of the emergency plan. Attachment 2 contains a description of the changes to the emergency plan in this revision. Attachment 3 contains revision 16 of the emergency plan. Each page of attachment 3 should be used to replace the corresponding page in the current copy of the emergency plan (revision 15). It contains only the pages of the emergency plan that have been changed in revision 16.

Two copies of revision 16 have also been forwarded to the NRC Region III office as required by 10 CFR 50.4(b)(5).

Please sign and return the attached document control acknowledgement letter for our records.

Sincerely,

E. E. Fitzpatrick
Vice President

/vlb

Attachments

c: J. A. Abramson
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Emergency Plan, Revision 16

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ATTACHMENT 1 TO AEP:NRC:0824Q
ASSESSMENT OF ACCEPTABILITY OF EMERGENCY PLAN CHANGES
REVISION 16

This attachment documents an assessment of acceptability of emergency plan (revision 16) changes per 10 CFR 50.54(q). The criteria used were presented in a draft Nuclear Energy Institute (NEI) industry white paper, dated April 10, 1996, and consist of three questions to be applied to all emergency plan changes. The three questions and answers relative to revision 16 of the emergency plan are as follows.

DOES THE CHANGE DECREASE THE EFFECTIVENESS OF THE PLAN RESULTING IN THE LOSS OF REASONABLE ASSURANCE THAT ADEQUATE PROTECTION CAN AND WILL BE TAKEN IN THE EVENT OF A RADIOLOGICAL EMERGENCY AS REQUIRED BY 10 CFR 50.47(a)?

Yes _____ No x

Most of the emergency plan changes in revision 16 relate to the relocation of the emergency operations facility (EOF) from the St. Joseph district service center on Meadowbrook Road in Benton Township, Michigan, to the nuclear generation group headquarters (NGGH) building in Buchanan, Michigan. Concurrent with this relocation, the headquarters support group (HSG) was dissolved, while any necessary functions from that group (i.e., American Nuclear Insurers (ANI), INPO, and Westinghouse Liaisons) have been integrated into the EOF staff.

The above changes do not result in a decrease in the effectiveness of the plan because they should result in a more timely mobilization of the EOF staff should an activation occur during normal working hours. Should an activation occur during off hours, the time required for personnel to report to the EOF would not be significantly different from the time required to report to the EOF in Benton Township.

The elimination of the HSG does not decrease the emergency response capabilities of the nuclear generation group (NGG). This group was located in Columbus, Ohio, prior to the relocation of corporate nuclear organization personnel to Buchanan, Michigan, and was known as the corporate support group. Its function was to provide a line of communication to corporate resources that might be needed to support Cook Nuclear Plant personnel's response to an emergency situation. With the corporate relocation, those resources are now located in either the Buchanan office, or at Cook Nuclear Plant, and therefore, are more readily available to the emergency response organization (ERO).

A change in the description of the AEP microwave system reflects the addition of a direct link between Cook Nuclear Plant and Buchanan, Michigan, and the elimination of a direct link between the plant and Columbus, Ohio. This change will not decrease the effectiveness of the emergency plan because a direct microwave link will still exist between the plant and the NGGH.

A change was made in the section of the plan pertaining to the description of the concept of operations related to the transfer of responsibility for making protective action recommendations (PARs). This change to section 12.3.9.4.2 specifies that the determination of PARs for the public will be assumed by the EOF only if the position of recovery and control manager has been activated. This ensures that the responsibility for making PARs to the appropriate offsite agencies will remain with the senior manager responsible

for the overall emergency response functions, and so does not decrease the effectiveness of the emergency plan.

For consistency with the revised concept of operations due to the EOF relocation, the procedure in the AEP emergency response manual (ERM) regarding the HSG has been deleted, as well as the procedure regarding the engineering, design and site services manager. Several ERO positions described in the latter procedure have been incorporated into the appropriate emergency plan implementing procedures (EPPs), while several others have been deleted.

The deleted positions include the mechanical, electrical and design coordinators, and the directors of site services, engineering procurement, and quality assurance. It is not necessary to activate those positions with the initial EOF activation. Instead, the engineering, design and site services manager, with the assistance of the engineering director (both called out at an alert or higher) will arrange for additional engineering support, as necessary, to assist the ERO. Because of the close proximity of all NGG personnel, and the fact that these additional personnel would most likely not be needed in the initial stages of an emergency, these changes will not decrease the effectiveness of the emergency plan.

The AEP ERM is a collection of procedures pertaining to the emergency responsibilities of AEP personnel not covered by the EPPs. Changes to that manual relating to the relocation of corporate nuclear generation personnel from Columbus, Ohio, to Michigan, along with the corresponding changes to the emergency plan, were addressed in our letter AEP:NRC:0824P, dated June 5, 1997, in revision 15 of the plan and the associated justification of the changes.

DOES THE CHANGE RESULT IN THE LOSS OF ABILITY TO MEET ANY OF THE STANDARDS OR APPLICABLE REQUIREMENTS DESCRIBED IN 10 CFR 50.47(b) AND (d) OR ANY NRC-APPROVED ALTERNATIVES TO THOSE STANDARDS AND REQUIREMENTS?

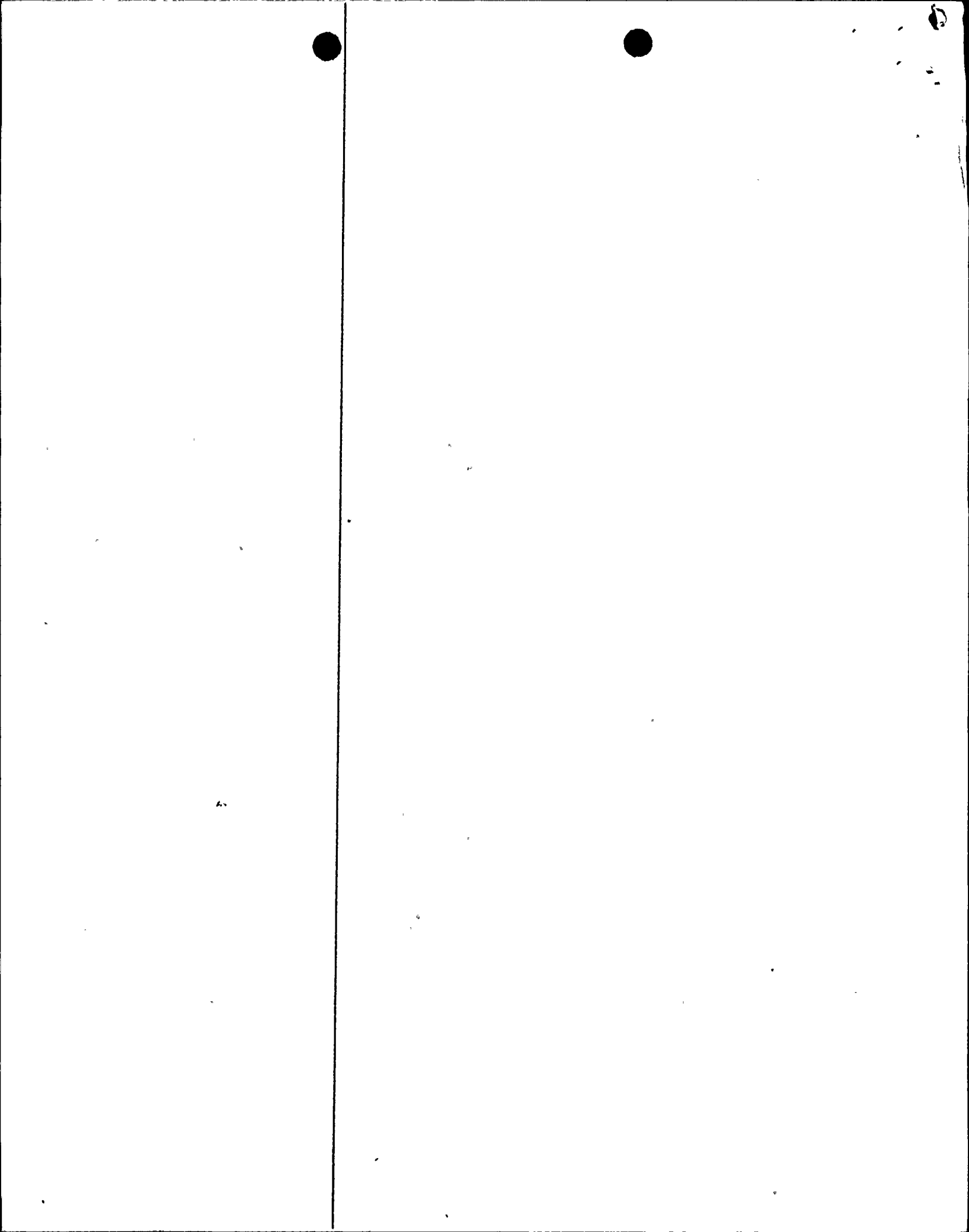
Yes _____ No x

The following tables summarize the standards and requirements of 10 CFR 50.47(b) and 10 CFR 50 Appendix E, and the changes to the emergency plan that may be considered to potentially affect those standards. The discussion following the tables provides justification for why the changes do not affect our ability to meet those standards.

10 CFR 50.47(b) Review

Do the changes to the emergency plan in revision 16 potentially affect any of the following standards of 10 CFR 50.47(b)?

1. Assignment of Responsibility	Yes <u> x </u>	No _____
2. Onsite Emergency Organization	Yes _____	No <u> x </u>
3. Emergency Response Support and Resources	Yes _____	No <u> x </u>
4. Emergency Classification System	Yes _____	No <u> x </u>
5. Notification Methods and Procedures	Yes <u> x </u>	No _____
6. Emergency Communications	Yes <u> x </u>	No _____
7. Public Education and Information	Yes _____	No <u> x </u>
8. Emergency Facility and Equipment	Yes <u> x </u>	No _____
9. Accident Assessment	Yes <u> x </u>	No _____



10. Protective Response	Yes <u>x</u>	No <u> </u>
11. Radiological Exposure Control	Yes <u> </u>	No <u>x</u>
12. Medical and Public Health Support	Yes <u> </u>	No <u>x</u>
13. Recovery and Re-Entry Planning and Post Accident Operations	Yes <u>x</u>	No <u> </u>
14. Exercises and Drills	Yes <u> </u>	No <u>x</u>
15. Radiological Emergency Response Training	Yes <u> </u>	No <u>x</u>
16. Responsibility for the Planning Effort	Yes <u> </u>	No <u>x</u>

Standard No. 1

Although there is a shifting of responsibilities among NGG personnel, all EOF positions described in the emergency plan are staffed with qualified, trained emergency responders, with three persons assigned to each position to allow for 24 hour per day response. The operational role of the EOF and its relationship to the total effort has not changed.

The elimination of the HSG will also not affect our total emergency response effort. As described earlier in the response to the first question in this assessment, HSG positions deemed essential for initial response to an emergency have been integrated into the EOF staff as listed in the EPPs.

Positions eliminated from the engineering, design and site services manager's staff are not essential to the initial response to an emergency, but will be available on short notice at his discretion.

Standard No. 5

Procedures for communication between the EOF and offsite agencies and other onsite emergency response facilities have been established and will be modified as necessary to accommodate the relocation of the EOF to Buchanan. These changes are minor and do not change the basic communication network established for the ERO. The contents of emergency messages to the state and local agencies do not change, nor does the system for those agencies to disseminate such information to the public.

Standard No. 6

The organizational titles for the EOF communicators assigned to state and local response agencies have not been changed. Provisions for communicating with the NRC have not been changed either and will follow established procedures delineated in the EPPs.

Standard No. 8

The new EOF is equipped with communications and other equipment that is at least equivalent to that in the Benton Township EOF. It is an improved location from which to evaluate and coordinate all emergency response activities for Cook Nuclear Plant due to its location in the NGGH building. This places it in close proximity to many resources that would not be readily available in the Benton Township EOF.

Standard No. 9

Information from the plant process computer (PPC) is available in the new EOF to allow monitoring of the magnitude of radiological

releases and evaluation of meteorological conditions. Personal computers (PCs) are also available with software to allow calculation of offsite doses resulting from any radiological releases.

Equipment is available for communications with field monitoring teams that can be utilized in locating and tracking radioactive plumes.

Standard No. 10

Procedures, equipment, and staff necessary to make prompt protective action recommendations to offsite agencies are available in the new EOF. This includes PPCs, PCs, and communications equipment at least equivalent to that present in the Benton Township EOF. Maps with necessary information such as evacuation areas and preselected radiological sampling areas are also located in the new EOF.

Standard No. 13

Procedures and staff will be present in the new EOF for developing plans and procedures for reentry and recovery. The position of recovery and control manager will be located in the EOF. The location of the new EOF in the NGGH building makes it readily accessible to senior management members who may be required to fill this position.

10 CFR 50 Appendix E Review

Does this change affect any of the following subject areas of 10 CFR 50 Appendix E?

(i) (ii) (iii) Emergency Plans as Described in FSAR	Yes	___	No	<u>x</u>
(iv) A. Organization	Yes	___	No	<u>x</u>
(iv) B. Assessment Actions	Yes	<u>x</u>	No	___
(iv) C. Activation of Emergency Organization	Yes	<u>x</u>	No	___
(iv) D. Notification Procedures	Yes	<u>x</u>	No	___
(iv) E. Emergency Facilities and Equipment	Yes	<u>x</u>	No	___
(iv) F. Training	Yes	<u>x</u>	No	___
(iv) G. Maintaining Emergency Preparedness	Yes	<u>x</u>	No	___
(iv) H. Recovery	Yes	<u>x</u>	No	___

Subject Area (iv) B

See discussion under standard no. 9 above.

SUBJECT AREA (iv) C

The communication steps to be taken to alert or activate emergency personnel under each class of emergency are not being changed, nor are the emergency action levels.

SUBJECT AREA (iv) D

See discussion under standard no. 5 above.

SUBJECT AREA (iv) E

See discussion under standard no. 8 above.

SUBJECT AREA (iv) F

Personnel assigned to the new EOF have been trained in accordance with established procedures for training all ERO members prior to the declaration that the new EOF is operational.

SUBJECT AREA (iv) H

See discussion under standard no. 13 above.

DOES THIS CHANGE DELETE OR CONTRADICT ANY OTHER REGULATORY REQUIREMENT?

Yes _____ No x

The new EOF was evaluated against the requirements of NUREG-0696. The results of that evaluation are given in the following discussion.

Function

The function of the EOF has not changed following its transfer from Benton Township to the NGGH. It continues to have facilities for overall management of emergency response, coordination of radiological and environmental assessment, determination of public protective action recommendations, and coordination of emergency response activities with federal, state, and local agencies. It will also be used as a post accident recovery management center.

Location, Structure, and Habitability

The location of the new EOF provides excellent functional and availability characteristics for carrying out emergency response functions specified for the EOF, due to its location in the NGGH. Because of the distance from Cook Nuclear Plant of approximately 14 miles, its EOF functions should not be interrupted during radiation releases for which it is necessary to recommend protective actions for the public.

Staffing and Training

The new EOF is staffed, as was the Benton Township EOF, to provide overall management of NGG resources and the continuous evaluation and coordination of activities during and after an accident.

Size

The new EOF is large enough to provide working space for personnel assigned from the NGG and at least twenty-three NRC personnel during periods when the EOF is activated for emergencies. It exceeds the criterion of 75 sq. ft. of working space per person.

Technical Data and Data System

PPC terminals in the new EOF provide the means for receiving, storing, processing, and displaying information sufficient to perform assessments of the actual and potential onsite and offsite environmental consequences of an emergency condition. The accuracy of the data displayed is equivalent to that of the data displayed in the technical support center. Trend information and time-history displays are available through the PPC. Sufficient PPC

terminals are available to allow retrieval of necessary information by the different functional groups in the EOF. The data retrieval and display systems are equivalent to those in the Benton Township EOF, which have been previously found to be in compliance with the requirements of this section.

Records Availability and Management

All manuals, procedures, and other documentation currently located in the Benton Township EOF were transferred to the new EOF at the time that facility became operational. In addition, the resources of the NCGH library, located on the third floor of the same building as the EOF, will be available to the EOF staff.

Safety Parameter Display System

The safety parameter display system (SPDS) will function in the new EOF as it did in the Benton Township EOF.

Nuclear Data Link

The nuclear data link, emergency response data system, will continue to function as it did before the relocation of the EOF from Benton Township.

Emergency Response Facility Integration

The function of the new EOF has not changed from that of the Benton Township EOF in terms of its interactions with other emergency response facilities and governmental agencies. The lines of communication with these other agencies and facilities have not changed, except for those with the HSG, which no longer exists following the transfer of the EOF from Benton Township. The elimination of the HSG was discussed earlier in this document.

To the best knowledge of the author of this memo, none of the above changes to the emergency plan delete or contradict any other regulatory requirement.

ATTACHMENT 2 TO AEP:NRC:0824Q
DESCRIPTION OF EMERGENCY PLAN CHANGES
REVISION 16

Emergency Plan Section/Description of Change

- 12.3.1.5 Modified description of location of the emergency operations facility (EOF) to reflect the relocation of the EOF from St. Joseph district service center in Benton Township, Michigan, to Buchanan, Michigan.
- Deleted description of headquarters support group (HSG) from the list of definitions. This group will be eliminated concurrently with the relocation of the EOF from the St. Joseph service center to Buchanan, Michigan.
- Deleted reference to the HSG from the definition of the technical support center (TSC) (definition #18). This is now definition #17.
- 12.3.3.2 Corrected description of figures that describe the plant emergency organization from "12-4 and 12-5" to "12-4 through 12-9", deleted HSG from list of facilities to be activated during an alert, and added words to the first paragraph to explain that the emergency news center will not be activated at a site area emergency or a general emergency.
- 12.3.3.2.14 Deleted "Maintaining contact with the Headquarters Support Group..." as one of the responsibilities of the plant evaluation team.
- 12.3.3.2.15 (3) Deleted HSG from list of facilities with which the TSC must maintain contact.
- 12.3.3.2.20 (3) Deleted HSG from the list of facilities/agencies with which the EOF must establish communications. Added ANI and INPO to the list.
- 12.3.3.3 Deleted all references to the HSG and position descriptions for that group, except for the outside agency liaisons, which will be added to the emergency response call out list and described in the emergency plan implementing procedures (EPPs). A description of these liaison positions was also added to the emergency plan and numbered 12.3.3.2.28.
- 12.3.3.3.7 Renumbered description of recovery and control manager position as 12.3.3.2.29.
- 12.3.3.3.8 Deleted reference to AEP ERM as the location of information relating to the engineering, design and site services manager. Personnel assigned to this position will be listed in PMSO 150. Also deleted requirement that personnel assigned to this position must be approved by the executive vice president nuclear generation. This section was renumbered as 12.3.3.2.30.
- 12.3.3.3.9 Deleted reference to AEP ERM as the location of information relating to the scheduling and

- planning manager. Personnel assigned to this position will be listed in PMSO 150. Also deleted requirement that personnel assigned to this position must be approved by the executive vice president nuclear generation. This section was renumbered as 12.3.3.2.31.
- 12.3.3.5 Deleted reference to the HSG. This section was renumbered as 12.3.3.4.
- 12.3.3.5.1 This section was renumbered as 12.3.3.4.1.
- 12.3.3.5.2 This section was renumbered as 12.3.3.4.2.
- 12.3.3.5.3 Changed description of responsibility for implementation of federal radiological emergency response plan (FRERP) to reflect NRC role as the lead federal agency in accordance with "Response Coordination Manual 1996" (NUREG/BR-0230). This section has been renumbered 12.3.3.4.3.
- 12.3.3.8 Changed AEP ERM to EPPs as the location of contact information for the voluntary mutual assistance agreement. This section has been renumbered 12.3.3.7.
- Figure 12-6 Deleted figure 12-6, which was the organizational chart for the HSG.
- Figure 12-7 Modified figure 12-7, "Recovery and Control Manager's Staff", to reflect elimination of the HSG and other positions formerly reporting to the engineering, design and site services manager that will not be included in the EOF staff.
- Figure 12-10 Modified figure 12-10, "Cook Nuclear Plant Emergency Response Communications Flow", to reflect the elimination of the HSG.
- 12.3.6.7 Changed responsibility for notifying ANI from the HSG to the EOF.
- 12.3.7.2.1 Changed description of AEP microwave system to reflect current configuration.
- 12.3.7.3 Aligned table of emergency response facility communications capabilities for clarity. There were no actual changes to this table relating to communications capabilities.
- 12.3.8.6 Eliminated information about the EOF relative to the joint public information center that will no longer be accurate when the EOF is moved to Buchanan, Michigan.
- 12.3.9.1.4 Deleted reference to communications between the TSC and the HSG.

- 12.3.9.2.2 Deleted reference to communications between the engineering, design and site services manager and the HSG.
- 12.3.9.2.4 Modified description of the EOF and personnel assigned to it. Also deleted reference to communications between the EOF and the HSG.
- Deleted reference to the radiation data display system. This equipment will not be available in the new EOF, but all required radiation monitoring system data will be available via the PPC.
- 12.3.9.4.1 Deleted reference to communications between the TSC and the HSG.
- 12.3.9.4.2 Changed wording to reflect activation process for the EOF following its relocation to Buchanan, Michigan. Added wording to indicate that the EOF will be responsible for the determination of protective action recommendations only if the recovery and control manager position is activated.
- Figure 12-13 Modified figure to reflect location of EOF following relocation to Buchanan, Michigan.
- Figure 12-14 Modified description of location of EOF to reflect relocation to Buchanan, Michigan.
- Appendix B Deleted references to procedures relating to the HSG and the engineering, design and site services manager and staff. Required information from the latter procedure has been incorporated into the appropriate EPP.

ATTACHMENT 3 TO AEP:NRC:0824Q

EMERGENCY PLAN CHANGES
REVISION 16

