

DMB

# INDIANA & MICHIGAN ELECTRIC COMPANY

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

PRINCIPAL STAFF	
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July 29, 1983  
AEP:NRC:0824

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
RESPONSE TO OUR EMERGENCY PREPAREDNESS APPRAISAL

Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

On June 7, 1983 we were informed by your staff that there were four items in our Emergency Plan listed in Appendix D to your letter of June 30, 1982, which required a response from us in order to allow you to complete the evaluation report on the Donald C. Cook Nuclear Plant Emergency Plan. The four areas are:

- (1) letters of agreement with local authorities,
- (2) emergency action level guidelines,
- (3) evacuation time estimates, and
- (4) training for certain on-site and off-site groups.

Attachment 1 to this letter responds to these items by clarifying our position or by explaining what changes will be included in our next revision (Revision 2) to the Emergency Plan. Revision 2 will be issued on or before September 16, 1983.

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AUG 03 1983

We trust that Attachment 1 will clarify these four areas to your satisfaction.

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.

Very truly yours,

  
M. P. Alexich  
Vice President

MPA/os

cc: John E. Dolan  
R. S. Hunter  
R. W. Jurgensen  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Charnoff  
NRC Resident Inspector at Cook Plant - Bridgman

Attachment 1 to AEP:NRC:0824

This attachment addresses four items identified in Appendix D "Emergency Preparedness Evaluation Report" of Mr. James G. Keppler's letter to John E. Dolan dated June 30, 1982.

I. Letters of Agreement

Your staff asked for the status of the letters of agreement with the City of Bridgman Fire Department, and Lake Township Ambulance and Rescue. The letters of agreement with the City of Bridgman Fire Department are in the current revision (i.e. Revision 1) of the Emergency Plan, Appendix C. This revision was transmitted to you in our letter No. AEP:NRC:0719 dated August 12, 1982. The letters of agreement with the Lake Township Ambulance Service, as well as another letter of agreement with Medic Community Emergency Service, will be included in Revision 2 of the Emergency Plan. Copies of the letters from the City of Bridgman Fire Department and Lake Township Ambulance Service are attached.

Your staff asked for more detail in the letters of agreement in Appendix C to our Plan. We will inform the agencies with which we have agreements of the detail required by NUREG-0654 to be in these letters; and we will ask them to include this detail in the bi-annual upgrade of their letters where it is possible for them to do so.

II. Emergency Action Levels

Each Emergency Condition Category (ECC) for which your staff had questions is addressed below.

- a. You asked for a clarification of ECC 10, Loss AC Power, Unusual Event. In the next revision we will change it to read:
  1. Loss of all off-site AC power capabilities such that the T-11 A, B, C, D buses for U-1 (or T-21 A, B, C, D buses for U-2) cannot be energized from these sources.
  2. Loss of all on-site AC power capabilities (both diesel generators for one unit and that unit's main turbine-generator are unavailable or inoperable due to mechanical, electrical or error effects).

- b. For ECC 12, Unusual Event, Item 1e., you asked us to clarify "essential communication." We will delete Item 1e in its entirety. Any event that could cause a loss of communication would be covered by other ECC's (i.e. Sabotage of system covered under ECC-7; damage by natural disaster would be covered under ECC-3 (earthquake), ECC-8 (Tornado or severe winds)).
- c. For ECC 12, under Site Emergency, we will add another guideline to cover anticipated transients without the ability to SCRAM. This guideline will be:
  - 2. Transient requiring operation of shutdown systems with failure of both manual and automatic SCRAM capabilities (continued power generation but no core damage immediately evident).
- d. For ECC 3, your staff wanted us to use OBE and SSE levels in determining the EAL. We feel that our guidelines are conservative and more quickly and easily used by the operator, than waiting for a seismic accelerometer trace to be taken off-site and analyzed; therefore, we will retain the ECC but with two changes. First to clarify the word "significant" under site emergency, we will change the guideline to read:
  - 1. Earthquake that is of sufficient magnitude to cause damage to equipment needed to safely shut down the Unit. It may cause an automatic trip of the reactor and/or turbine due to equipment or instrumentation malfunctions.

Also, we will add a footnote for Alert 1 and Site Emergency 1 that reads:

Seismic instrumentation is installed at the plant (Emergency Plan 12.3.9.5.2.1, pg 12.3-176). In the event of an earthquake the traces will be analyzed off-site to determine the level of the earthquake (i.e. OBE or SSE) for post-emergency assessment.

- e. ECC 17 was unclear as to what "confirmed high radiation levels" are when the Steam Jet Air Ejector Monitor (R-15) goes off-scale and the Steam Generator Blowdown Monitor (R-19) has a large increase. These two monitors provide a degree of redundancy and they would be an indication of high radiation levels. Therefore, we will eliminate "and confirmed high radiation levels" from ECC 17, Alert 2.

f. For Alert 4 of ECC 14, your staff asked us to clarify the wording for "leak rate above the Technical Specifications" It would be difficult for an operator to determine the exact leak rate. To make it more easily understood, we will change it to read:

4. Primary Coolant leak rate is too high for one charging pump to maintain level in pressurizer above 22%.

Also, in ECC 14, General Emergency 1c, "High potential for loss of containment integrity" was unclear. To clarify it we will add "(ie. containment pressure is 9 psig and increasing)" to the end of the statement. Accident analyses of the ice condenser containment show that the pressure for a large LOCA should peak at approximately this value and then decrease. Hence, an increasing pressure above this value would be considered a high potential for loss of containment integrity as far as emergency response is concerned.

### III. Evacuation Time Estimates

Your staff could not locate these estimates in the Cook Plant Emergency Plan. The Berrien County Emergency Operations Plan was referenced in our plan in Section 12.3.11.7 on page 12.3-223. The County Plan includes evacuation time estimates. We do not feel that these evacuation time estimates should be included in our Emergency Plan since this reference is already provided in the appropriate Plan.

### IV. Training

Your staff pointed out that the training program for security; repair and damage control; ambulance and rescue; and local civil defense or local sheriff personnel did not seem to be addressed in the plan. The training programs for these groups are covered by our Emergency Plan Implementing Procedure PMP 2082 EPP 006. The Emergency Plan references the emergency procedure for the training of the ambulance and rescue personnel in Section 12.3.13.2 of the plan. Training of repair and damage control, security and local sheriff personnel will be covered in the plan by adding to Section 12.3.15.1 a brief discription of this training program.

# Lake Township

*Ambulance & Rescue*

*1410 Shawnee Rd.*

*Bridgman, MI 49106*

*Phone 465-6351*

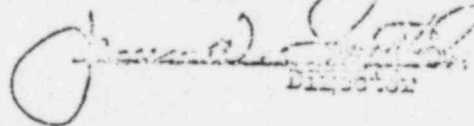
15 November 82

Mr Roland Begor.

Re: Our conversation on 10 Nov 82, We at Lake Township Ambulance and Rescue would like to assure you "and the people of D.C.Cook" Should our services be needed we will be more than happy to respond. Our units are manned 24 hrs a day 7 days a week. All so other W.M.T.s are on call at all times, If there are any questions please call.

Yours Truly

Lake Township Ambulance & Rescue

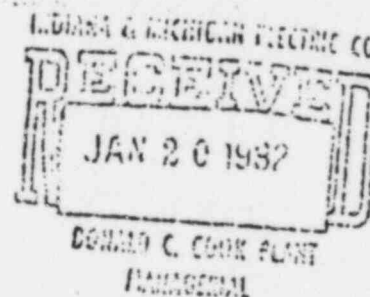
  
Director

R. Baggett

# CITY OF BRIDGMAN

FIRE DEPARTMENT

4234 Vine Street  
Bridgman, Michigan 49106



JAN. 10, 1982

TO- W.G. SMITH JR.

FROM- JACK MABRY

SUBJECT. \_ \_ RESPONSE TO EMERGENCY OF D.C. COOK PLANT:

THE BRIDGMAN FIRE DEPT. WILL RESPOND TO ANY FIRE CALL  
OR ANY EMERGENCY THAT MAY ARISE. FOR THE YEAR OF 1982.  
OUR PHONE IS 465-5555.

*Jack Mabry*  
JACK MABRY CHIEF  
BRIDGMAN FIRE DEPT.



# CITY OF BRIDGMAN

FIRE DEPARTMENT

4234 Vine Street  
Bridgman, Michigan 49106

JAN 9 1982

Too; Mr. W.G. SMITH JR.

THIS IS TO INFORM YOU THE BRIDGMAN FIRE DEPT. WILL RESPOND  
TO ANY FIRES OR ANY OTHER EMERGENCY THAT MAY OCCUR.  
TELEPHONE 465-5555

JACK MCBRY, CHIEF

*Jack Mabry*



# CITY OF BRIDGMAN

## FIRE DEPARTMENT

4234 Vine Street  
Bridgman, Michigan 49106

JAN. 9 1982

### FIREFIGHTERS FOR THE CITY OF BRIDGMAN

#### OFFICERS

JACK MABRY CHIEF  
WILLIAM BIYD ASST. CHIEF  
JEROME BRINCKS CAPT.  
DAN SHEPHERD LT.  
CHARLES VAN HELLEN ENG.  
ROBERT LISKEY SEC. & TREA.

#### FIREFIGHTERS

ALLAN BARKER  
DOUG BARKER  
DENNIS BARNES  
JIM CATANIA  
GERALD KELLER  
DOUG MILLER  
RUSS STINE  
WILLIAM SKIBA  
WILLIAM BOYD JR.  
RICHARD FUDOR

*Jack Mabry Chief*