

INDIANA & MICHIGAN ELECTRIC COMPANY

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

July 27, 1983
AEP:NRC:0837

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 REPORT Nos. 50-315/83-08 (DRMSP); 50-316/83-09 (DRMSP)

Mr. James G. Keppler
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter is in response to Mr. C. J. Paperiello's letter dated June 28, 1983, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant during the periods April 27-29 and May 3-6, 1983. The Notice of Violation attached to Mr. Paperiello's letter identified one item of noncompliance with NRC requirements. Our response to this item is presented below.

ITEM

10 CFR 20.201(b) states that each licensee shall make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in this part, and (2) are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. A "survey" is defined in 10 CFR 20.201(a) as an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. 10 CFR 20.103(b)(2) requires licensees to evaluate any intake of radioactive material which exceeds a 40-hour control measure and take actions to assure against recurrence.

Contrary to the above, in vivo count data for a terminating worker showed 95 nCi and 75 nCi of cobalt 60 on January 14 and 15, 1983, respectively. Although these data exceeded the 40-hour control measure for the long-term, insoluble cobalt 60 deposited in the lungs, no further in vivo counts or other evaluations were performed to properly evaluate the cobalt 60 deposition.

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RESPONSE

We recognize that we are not being cited for an overexposure of an individual. The cited exposure is below the limits stated in 10 CFR 20.103(a)(1). Therefore, we are addressing our actions taken to preclude recurrence of the cited incident.

(1) Corrective Action Taken and Results Achieved

Based on our review, the cited incident appears to be an isolated case.

(2) Corrective Action Taken to Avoid Further Noncompliance

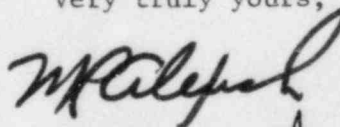
In April, 1983, a programmatic change, reflected in procedures 12 THP 6010.RAD.447 (Whole Body Counting) revision 2 and 12 THP 6010.RAD.409 (Assessment of Whole Body Count) revision 2, was made. This change will assure that additional in vivo counts or other evaluations are performed of any indicated intake of radioactive material which exceeds a 40-hour control measure. Specifically, the change requires the individual performing the whole body count to calculate the fraction of a 10 MPC-hr exposure based on the results of the preliminary analysis of the data from the whole body count. If the results of this calculation indicate a potential exposure of greater than 10 MPC-hrs, the procedure then specifies actions to be taken including attempting personnel decontamination and/or further investigation. This change should prevent recurrence of this type of incident.

(3) Date of Full Compliance

Full compliance has been achieved.

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

Very truly yours,



M. P. Alexich
Vice President

MPA:las

cc: John E. Dolan
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
E. R. Swanson, NRC Resident Inspector - Bridgman