

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
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April 13, 1984
AEP:NRC:0879

Donald C. Cook Nuclear Plant Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC Report No. 50-315/84-05(DRMSP); 50-316/84-05(DRMSP)

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

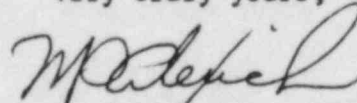
Dear Mr. Keppler:

This letter responds to Mr. C. J. Paperiello's letter dated March 14, 1984, which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant during the period February 13-17, 1984. The Notice of Violation attached to Mr. Paperiello's letter identified one (1) item of noncompliance, which is addressed in the Attachment to this letter.

As a point of clarification Section 8 (page 9) of the subject inspection report stated that a "brief insert" has been distributed on a semi-annual basis to all service customers. The insert is actually distributed on an annual basis.

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

KEM
4-13-84

MPA/cm
Attachments

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

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ATTACHMENT TO AEP:NRC:0879

RESPONSE TO NOTICE OF VIOLATION

ITEM

10 CFR 50.54(q) states in part that: "A licensee authorized to possess and/or operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) of this part and the requirements in Appendix E to this part." In addition, Technical Specifications 6.8.1.e states in part that, "Written procedures shall be established, implemented and maintained covering Emergency Plan implementation."

PART (a)

- a. Contrary to Section 2.2 of Emergency Plan Procedure PMP-2080.EPP.008, quarterly verifications of Exhibit A to this procedure were not performed during the fourth quarter of 1983.

RESPONSE TO PART (a)

1. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

The review process for the purpose of verifying individual telephone number listings (Exhibit A) as per Section 2.2 of the Emergency Plan Procedure PMP-2080-EPP.008 was started in December 1983. During this review, it became apparent that due to attrition and re-organization, several positions were in need of re-assignment. In addition, during Emergency Plan drills in December, 1983, problems were discovered in the call tree sequence for activating the Emergency Operations Facility and the Joint Public Information Center. An interim call list, with verified telephone numbers, was established and supplied to Security personnel responsible for initiating the call trees. This call list was utilized during the annual Emergency Plan exercise in January, 1984. The intent of the interim call list was to verify the call tree sequence and telephone numbers during the exercise and, if satisfactory, to issue the revised procedure and Exhibit "A" following that verification. Final revision of the procedure and the review process took longer than expected following the exercise. The revised procedure was issued March 8, 1984.

2. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCE

Although telephone number listings were verified during the required interval, the procedure was not revised and reissued due to attempts to combine the verification and procedure revision process. Quarterly reviews in the future will address only verification of individual telephone number listings, while procedure revisions will be addressed separately.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on March 8, 1984, when the revision to PMP-2080.EPP.008 was issued.

PARTS (b), (c) and (d)

- b. Contrary to Section 4.1 of Emergency Plan Procedure PMP-2082.EPP.009, quarterly completion of Exhibit C was not performed during the first three quarters of 1983; and completion of Exhibit B was not performed during the first half of 1983.
- c. Contrary to Section 4.2.1 of Emergency Plan Procedure PMP-2082.EPP.005, quarterly drills for Radiological Monitoring Team Activation and Health Physics were not documented for any quarter in 1983.
- d. Contrary to Section 12.3.15.1 of the Donald C. Cook Emergency Plan, Rev. 2, the semi-annual off-hours shift augmentation drill was not performed during the first half of 1983.

RESPONSE TO PARTS (b), (c) and (d)

1. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Review of Emergency Planning requirements during August/September, 1983, due to the appointment of a new site emergency preparedness coordinator, indicated the required quarterly and semi-annual drills, inventories, assignment up-dates, etc. had not been scheduled during the first three quarters of 1983. Following that discovery, the appropriate checklists were distributed in October, 1983, for resolution and required drills were scheduled. The majority of checklist items were resolved during October, 1983. However, several items (i.e., review of training documentation, personnel assignments, procedure manuals and previous drill discrepancies) were not completed until January, 1984 due to planning, training, etc. for the annual emergency plan exercise. The first of a series of drills was completed on November 9, 1983, stressing communications, radiological monitoring, health physics activities and operator action. An off-hours shift augmentation drill was satisfactorily performed on December 16, 1983.

A review of Radiation Protection Section training records following the February, 1984 NRC inspection revealed that emergency plan training had been performed and documented during May, June, July, 1983, by the Radiation Protection Training Supervisor. The training involved activation and walk-throughs of the Radiological Monitoring Team and some Health Physics activities. Participation by Radiation Protection personnel during pre-exercise drills during November/December, 1983, constituted the quarterly drill requirement for the fourth quarter of 1983.

2. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCE

Checklists in Emergency Plan Procedure PMP-2082.EPP.008 will be revised to include verification that all required drills (Radiological Monitoring, Health Physics and off-shift augmentation) are conducted and documented within the required intervals. These checklists will be reviewed and approved by the Site Emergency Preparedness Coordinator. In addition, all periodic emergency planning requirements will be entered on the Plant NTS computer program for scheduling periodic surveillance requirements. The procedure revision and addition to the NTS program will be completed by September 1, 1984. The Site Emergency Preparedness Coordinator will schedule and track these items manually until that time.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All required drills were conducted by December 16, 1983, as indicated above, with appropriate checklists completed in January, 1984. In addition controls are in place to assure that future drills will be appropriately scheduled and performed.

PART (e)

- e. Contrary to Section IV.E.9.d of Appendix E to 10 CFR Part 50, communications with the NRC Headquarters and Regional office from the nuclear power reactor control room, Technical Support Center, and Emergency Operations Facility were not tested on a monthly basis prior to October, 1983."

RESPONSE TO PART (e)

1. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Following receipt of NRC Inspection Report 50-315/83-09; 50-316/83-10, dated September 8, 1983, which requested clarification of various sections of the Donald C. Cook Emergency Plan, it became apparent that the 10 CFR 50, Appendix "E" requirement to perform a monthly test of communications facilities from the Technical Support Center and Emergency Operations Facility to the NRC Headquarters and Regional office had not been performed. The communication link in each control room is tested daily via the NRC initiated call, although this had not been documented. As a result of the NRC Inspection Report 50-315/83-09; 50-316/83-10, the Operations Department added monthly testing of the Technical Support Center phone and documentation of the daily NRC call to their Master Surveillance Schedule. Initial testing of the TSC phone was performed on November 6, 1983. Requirements for testing the phone in the Emergency Operations Facility were established in an Accounting Department Standing Order (OASO.002, Rev. 1 - EOF Test of ENS Phone) issued on December 14, 1983. The first test of this phone was conducted, however, on November 21, 1983.

2. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCE

Establishment of the testing requirements and frequencies in Plant procedures as indicated above will ensure timely performance of these surveillance requirements.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on November 21, 1983, following testing of all required telephone lines.

PART (f)

- f. Contrary to Section IV.B of Appendix E to 10 CFR Part 50, Emergency Action Levels were not reviewed with the State and local governmental authorities on an annual basis prior to January, 1984.

RESPONSE TO PART (f)

1. CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Review of the emergency planning requirements prior to January 1984 revealed that there was no exercise in calendar year 1983. So no review was done, as normally occurs, prior to and during an exercise. Three days training of local and State officials occurred on January 3-5, 1984 prior to the January 25, 1984 exercise and EAL's were reviewed with State and local authorities on January 17, 1984 as your Inspection Report states.

2. CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCE

The 12 month calendar will be revised to include this Emergency Action Levels Review as required. Also it will be more explicitly stated in the training format of the NUREG-0654 Training Support Program developed by the Emergency Management Division, Michigan Department of State Police, Part I: Basics of Radiation and Plant Operations: (Utility). The Plant Training Department will upgrade lesson plans and material to reflect appropriate EAL reviews as required.

3. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on January 17, 1984.