

# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

April 27, 1984  
AEP:NRC:0879A

Donald C. Cook Nuclear Plant Unit 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)

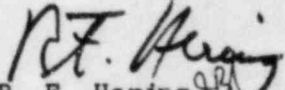
Mr. James G. Keppler, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

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. Appendix B to Mr. Paperiello's letter identified five (5) weaknesses in the area of Emergency Preparedness. Responses to these weaknesses are addressed in the Attachment to this letter.

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,

  
R. F. Hering  
Vice President 4/27/84

MPA/cm

Attachment

cc: John E. Dolan  
M. P. Alexich  
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:0879ARESPONSE TO EMERGENCY PREPAREDNESS WEAKNESSESWeakness No. 1

The next revision of the Emergency Plan should contain a description of the present site and corporate emergency planning organization and a description of the normal system to be implemented for assuring corrective actions resulting from weaknesses noted during drills and exercises are implemented. (Open Items 50-315/84-05-02; 30-316/84-05-02.)

Response to Weakness No. 1

Recent changes have been made in the D. C. Cook Nuclear Plant and American Electric Power Service Corporation organizations, including the emergency response organization, which will require revision of appropriate sections of the Emergency Plan during the next revision. In addition to revising the organizational figures, changes will also be made to related descriptive portions, and will include a description of the corrective action system in effect for assuring action on weaknesses identified during drills and exercises.

Weakness No. 2

Exhibit "L" of PMP-2081 EPP.004, Rev. 2, Protective Action Guides (PAGs) and Protective Actions, is illegible and should be re-done to make it readable.

Response to Weakness No. 2

PMP-2081 EPP.004, Protective Action Guides and Protective Actions, has been changed to incorporate a larger, more legible version of Exhibit "L". It should be noted that a larger (24" x 36") version of Exhibit "L" is mounted in the vicinity of the Radiation Protection Manager and Dose Assessment personnel in the EOF.

Weakness No. 3

Review for adequacy the emergency preparedness training of Shift Supervisors in the areas of event classification and protective action decision making. Based on weaknesses identified during the walkthroughs, this training may need to be expanded or provided on a more frequent basis.

Response to Weakness No. 3

The present emergency preparedness training for all licensed Senior Reactor Operators, including all Shift Supervisors, consists of the following:

1. Annual refresher training in Emergency Plan philosophy and procedures, including procedure structure and use.

2. Annual review of Emergency Response facilities and organizations.
3. Annual review of communication and information systems relative to the Emergency Plan.
4. Review of changes to the Emergency Plan and/or appropriate procedures as they are issued.

In addition, weaknesses identified during conduct of annual requalification examinations, including Emergency Plan and Implementing Procedures, become part of the licensed operator requalification program. Review of these procedures is also conducted on an as-needed basis (e.g., prior to large-scale exercise), to correct identified weaknesses during drills, etc.)

The above training (classroom) is considered adequate at this time. The perceived weaknesses in event classification and protective action decision-making should be improved by the conduct of more frequent (quarterly) Emergency Plan drills as noted above.

Weakness No. 4

A decision needs to be made as to which dose assessment model will be used at the D. C. Cook site, taking into account NRC requirements. The implementation of this model should be adequately described in the Emergency Plan and Emergency Plan Procedures (Open Item No. 50-315/84-05-05; 50-316/84-05-05.)

Response to Weakness No. 4

In keeping with the NRC Inspector's verification that the D. C. Cook Nuclear Plant has an adequate method for assessing consequences caused by radiological releases, and in our commitment to improve operations where possible, the following course of action has already been implemented.

On March 8, 1984, a meeting on Dose Assessment was held at the Michigan Department of Public Health which included representatives from the Health Department Radiological Health Division, Detroit Edison, Consumers Power Company, Indiana & Michigan Electric Company, American Electric Power Service Corporation, and NRC Region III. The meeting was held to define the direction in which dose assessment in Michigan should be going.

The D. C. Cook Nuclear Plant computer code, Dose Assessment Program (DAP), is being revised and will shortly be brought into agreement with the Generic Dose Assessment Procedure which was previously developed by parties involved using EPA-520/1-75-001 guidance.

After an NRC Workshop concerning NUREG/CR 3011 "Dose Projection Considerations for Emergency Conditions at Nuclear Power Plants" to be held in June 1984 and subsequent meeting(s) of all parties concerned, the D. C. Cook Nuclear Plant Emergency Plan and Implementing Procedures will be revised appropriately.

Weakness No. 5

The integration of wind speed and wind direction data into the dose assessment procedures should be up-graded to reflect the use of the 50-foot level of data as the primary source, and identify alternate sources of data when the 50-foot level as well as the 150-foot level are unavailable.

Response to Weakness No. 5

Emergency Plan Procedures have been revised to require the use of the 50-foot level instrumentation as the primary source for wind speed and wind direction in dose assessment calculations. In addition, back-up and alternate sources for this information will be listed and prioritized.