



February 17, 1997

AEP:NRC:1238A1
10 CFR 2.201

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
NRC INSPECTION REPORTS NO. 50-315 - 316/96004 (DRP)
REPLY TO NOTICE OF VIOLATION SUPPLEMENTAL INFORMATION

Our June 28, 1996, letter AEP:NRC:1238A provided our response to a letter from W. J. Kropp dated May 16, 1996, that forwarded two violations to Indiana Michigan Power Company. The first of the two violations was associated with changing the intent of two plant procedures without the required safety reviews being performed. As requested in the violation, our response was to delineate the steps taken to ensure that no operational direction would be provided to operators, outside of the operating procedures, when utilizing plant manager instruction (PMI) -4090, "Criteria for Conducting Infrequently Performed Tests or Evolutions." Subsequently, during the exit meeting for inspection report 50-315/316-96014, the senior resident inspector requested that we provide additional information regarding more generic actions we have taken to ensure changes to the intent of a procedure not be implemented without prior performance of a safety evaluation.

During the investigation into the subject violation, we determined the existing plant guidance on procedure intent was vague. Based on this, procedure PMI-2010, "Instructions, Procedures, and Associated Indexes Policy," was revised to clearly define "change of intent." The "change of intent" definition added to the procedure was based on industry input and describes conditions under which the intent of a procedure is changed. The definition provides a clear foundation to segregate procedure revisions into intent and non-intent changes, thereby providing assurance that safety reviews are performed when required.

Sincerely,

A handwritten signature in dark ink, appearing to read 'E. E. Fitzpatrick'.

E. E. Fitzpatrick
Vice President

250145

jmb

cc: A. A. Blind
A. B. Beach
MDEQ - DW & RPL
NRC Resident Inspector
J. R. Padgett

IEA 10