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Docket Nos. 50-315
and 50-316

Mr. John Dolan, Vice President
Indiana and Michigan Electric Company
Post Office Box 18
Bowling Green Station
New York, New York 10004

Dear Mr. Dolan:

The Commission has issued the enclosed Order confirming your commitments to implement those post-TMI related items set forth in NUREG-0737 for which the staff requested completion on or after July 1, 1981. This Order is based on commitments contained in the Indiana and Michigan Electric Company (IMECo) letters responding to the NRC's Generic Letters 82-05 and 82-10 dated March 17, 1982 and May 5, 1982, respectively, and as supplemented by IMECo letters dated November 5, 1982 and December 14, 1982.

The Order references the IMECo letters and, in its Attachments, contains lists of the applicable NUREG-0737 items with your schedular commitments. As discussed in the Order, several of the items listed in Generic Letter 82-10 will be handled outside of this Order.

The Commission's intention when it issued NUREG-0737 was that items would be completed in accordance with the staff's recommended schedule. However, our evaluation of your proposed schedule exceptions concludes that the proposed delays are acceptable. Among other things, the Order requires implementation of these items in accordance with your proposed schedule.

Some of the items set forth in the Attachments to the Order are subject to post implementation review and inspection. Our post implementation review and/or the development of Technical Specifications may identify alterations to your method of implementing and maintaining the requirements. Any identified alterations will be the subject of future correspondence.

A copy of this Order is being filed with the Office of the Federal Register for publication.

Sincerely,

Original signed by:
S. A. Varga

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
Order

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03/16/83

OFFICE	cc w/enclosure: ORB#1:DL See next page	ORB#1:DL CParrish 02/16/82	ORB#1:DL DWigginton:dm 01/21/83	ORB#1:DL SVarga 02/17/83	ORAB Lppolo 03/17/83	OELD 3 01/17/83	AD/OR:DL GKainas 02/17/83
DATE							
FORM	8303290800 830314 PDR ADOCK 05000315 P						

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Mr. John Dolan
Indiana and Michigan Electric Company

cc: Mr. M. P. Alexich
Assistant Vice President
for Nuclear Engineering
American Electric Power
Service Corporation
2 Broadway
New York, New York 10004

Mr. William R. Rustem (2)
Office of the Governor
Room 1 - Capitol Building
Lansing, Michigan 48913

Mr. Wade Schuler, Supervisor
Lake Township
Baroda, Michigan 49101

W. G. Smith, Jr., Plant Manager
Donald C. Cook Nuclear Plant
P. O. Box 458
Bridgman, Michigan 49106

U. S. Nuclear Regulatory Commission
Resident Inspectors Office
7700 Red Arrow Highway
Stevensville, Michigan 49127

Honorable James Bemnek, Mayor
City of Bridgman, Michigan 49106

U.S. Environmental Protection Agency
Region V Office
ATTN: EIS COORDINATOR
230 South Dearborn Street
Chicago, Illinois 60604

Maurice S. Reizen, M.D.
Director
Department of Public Health
P.O. Box 30035
Lansing, Michigan 48109

William J. Scanlon, Esquire
2034 Pauline Boulevard
Ann Arbor, Michigan 48103

The Honorable Tom Corcoran
United States House of Representatives
Washington, D. C. 20515

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

additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

- (1) For applicable items that have been completed, confirmation of completion and the date of completion, (2) for items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and (3) justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

III.

Indiana and Michigan Electric Company responded to Generic Letters 82-05 and 82-10 by letters dated December 23, 1981 and May 14, 1982, respectively.

These letters were further supplemented by letters on November 5, 1982 and December 14, 1982. In these submittals Indiana and Michigan Electric Company confirmed that some of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

There are six items from Generic Letter 82-10 that, as noted in the Table (Attachment 2), have licensee schedules to be determined and are therefore not included in this Order. Some of the items addressed in this Order are considered by the licensee to be completed or to require no modifications. The staff's evaluation of the licensee's delays for the remaining items is provided herein:

II.D.1.2 Relief and Safety Valve Test Program

The licensee has completed the plant specific evaluation of the safety (Crosby) and relief (Masoneilan) valves. These valves are the same size and series as those valves tested in the EPRI valve test program and the EPRI valve test conditions envelop the range of expected operating and accident conditions for the D. C. Cook Nuclear Plant. During the EPRI tests, pressure oscillations occurred in the valve inlet piping as a result of valve chattering. The Owners Group, of which D. C. Cook is a member, has authorized Westinghouse to perform

an operability study of the safety valves. In addition, EPRI is performing an evaluation of the piping structural response to incorporate the observed loads on the piping system. Plant specific submittals on safety and relief valve piping and its supports are also required and this evaluation has been delayed by the above operability tests and evaluations. The licensee, however, has completed their review of these piping systems and supports as a requirement of Bulletin 79-14 on seismic stresses on piping and supports. The adjusted loads due to safety valve operation will be used to confirm earlier findings on acceptability of the piping and supports. At the D. C. Cook Nuclear Plant, the pressurizer safety valves have never lifted.

II.F.1.1 Noble Gas Effluent Monitors

II.F.1.2 Iodine and Particulate Monitors

The licensee has encountered environmental interface problems with the design and location of noble gas effluent monitors for the main steam lines and for the steam jet air ejector and gland steam condenser vents. Modifications are being made to correct the deficiencies to make the installed system operable. In the interim, there are two high range and one low range noble gas monitors on the unit vent and noble gas monitors on the steam jet air ejector and gland steam exhaust. There is one particulate monitor on the unit vent. Particulate monitoring on the air ejector and gland steam exhaust are by grab samples; procedures are available for this.

For the main steam lines, procedures are available for the temporary use of strap-on monitors should they be necessary. The permanent monitors had been installed but are not operable.

Although the existing monitors and procedures are not consistent with the NUREG-0737 requirements, they are acceptable for the short period of time until the new systems can be made operable.

We find, based on the above evaluation, that: 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; 2) there is good cause for the several delays (interface problems); and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore, the licensee's commitment should be confirmed by Order.

IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

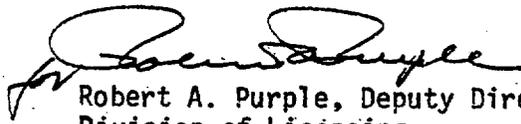
Implement and maintain the specific items described in the Attachments to this Order in the manner described in the licensee's submittals noted in Section III herein no later than the dates in the Attachments.

The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order. This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Purple, Deputy Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 14th day of March, 1983.

Attachments:

1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

PLANT NAME: D. C. Cook
Units 1 and 2

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
I.A.3.1	Simulator Exams	10/1/81	Include simulator exams in licensing examinations.	Complete
II.B.2	Plant Shielding	1/1/82	Modify facility to provide access to vital areas under accident conditions.	Complete
II.B.3	Post-accident sampling	1/1/82	Install upgrade post-accident sampling capability.	Complete
II.B.4	Training for Mitigating Core Damage	10/1/81	Complete training program.	Complete
II.E.1.2	Aux FW Indication & Flow Indicator	7/1/81	Modify instrumentation to level of safety grade.	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 5 - lower containment pressure setpoint to level compatible with normal operation.	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 7 - isolate purge and vent valves on radiation signal.	Complete

*Where complete date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

PLANT NAME: D. C. Cook
Units 1 and 2

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
II.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors.	May 1983
		1/1/82	(2) Provide capability for effluent monitoring of iodine.	April 1983
		1/1/82	(3) Install in-containment radiation-level monitor.	Complete
		1/1/82	(4) Provide continuous indication of containment pressure.	Complete
		1/1/82	(5) Provide continuous indication of containment water level.	Complete
		1/1/82	(6) Provide continuous indication of hydrogen concentration in containment.	Complete

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS) *
I.A.1.3.1	Limit Overtime	10/1/82 per Gen. Ltr. 82-12 dtd. 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Gen. Ltr. No. 82-12, dtd. June 15, 1982.	Complete
I.A.1.3.2	**Minimum Shift Crew	To be superseded by Proposed Rule.	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units.	To be addressed when Final Rule is issued.
I.C.1	**Revise Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability.	To be determined.
II.D.1.2	RV and SV Test Programs	7/1/82	Submit plant specific reports on relief and safety valve program.	July 1, 1983
II.D.1.3	Block Valve Test Program	7/1/82	Submit report of results of test program.	Complete
II.K.3.30 & 31	**SBLOCA Analysis	1 yr. after staff approval of model	Submit plant specific analyses.	To be determined following staff approval of model.
III.A.1.2	**Staffing Levels for Emergency Situations	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined.
III.A.1.2	**Upgrade Emergency Support Facilities	""	""	""
III.A.2.2	**Meteorological Data	""	""	""
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study	Complete

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.
 **Not Part of Confirmatory Order