

Docket Nos. 50-315
and 50-316

JAN 26 1984

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Mr. John Dolan, Vice President
Indiana and Michigan Electric Company
c/o American Electric Power Service Corporation
1 Riverside Plaza
Columbus, Ohio 43216

Dear Mr. Dolan:

In a letter dated November 29, 1983, the Indiana and Michigan Electric Company proposed a modification to an earlier license amendment request regarding the licensing status of the Donald C. Cook Nuclear Plant Operations Superintendent. Our staffs have held several conversations on this matter and it is our current position that the Technical Specifications Section 6.3 does not require modification. This is based on two considerations and our interpretation of ANSI N18.1(1971).

The IMEC requests included a permanent exception to ANSI N18.1(1971) so that new hires in the future for the Operations Superintendent position would be allowed two years to obtain the prerequisite Senior Operator's License. We are not inclined to make this permanent exception at this time but will consider any requests for exception on a case-by-case basis if the need ever arises again.

The second part of the request which was initiated in our discussions was the insertion of a statement that the Operations Superintendent need not maintain his license. The ANSI N18.1(1971) Article 4.2.2 clearly states, "(A)t the time of . . . appointment to the active position the operations manager shall hold a Senior Reactor Operator's License." The standard is not clear on whether the license should remain current. We believe the Operations Superintendent's knowledge of plant operations should remain current but that this can be done through effective training and daily interactions. Since maintaining the SOL would require considerably more effort and might detract from the overall operations supervision, we also believe the Operations Superintendent need not maintain the SOL but he should have capable and licensed individuals reporting to him. This is the case at the Donald C. Cook Nuclear Plant. We therefore interpret the current Technical Specifications and ANSI N18.1(1971) as allowing the Operations Superintendent not to maintain the Senior Operator License.

In this regard, however, the position description for the non-licensed Operations Superintendent and any other description of duties should clearly define duties and responsibilities as a non-licensed manager. The 10 CFR Part 55 is quite specific on, among other things, the definition of operator, senior operator, controls, and who may direct the licensed activities of

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licensed operators. The non-licensed Operations Superintendent must assure that his directions for operations are consistent with the requirements of 10 CFR 55.

We have determined that with the above interpretation of the Technical Specifications and ANSI N18.1(1971), the proposed change to Section 6.3 and corresponding change to Figure 6.2-2 are not required.

Sincerely,

Original signed by:
S. A. Varga

Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

cc: See attached list

ORB #1
DWigginton/jm
1/25/84

ORB #1
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1/20/84

Indiana and Michigan Electric Company

Donald C. Cook Nuclear
Plant, Units 1 and 2

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