



October 22, 2002

AEP:NRC:2691-22  
10 CFR 50.54(q)

Docket Nos.: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2  
EMERGENCY PLAN, REVISION 18

Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Units 1 and 2, submits the enclosed revision to the CNP Emergency Plan for review and approval. The revision removes the 30-minute augmented staffing positions from the CNP Emergency Plan, Planning Standard B, Table 1, "CNP Staffing for Radiological Emergencies," and places the augmenting staff either on shift, or in 60-minute augmented staffing positions.

A review of the revision was performed in accordance with 10 CFR 50.54(q) considering the requirements of 10 CFR 50.47, 10 CFR 50 Appendix E, and other applicable Nuclear Regulatory Commission (NRC) guidance. The review determined that the CNP Emergency Plan continues to meet the planning standards of 10 CFR 50.47(b), and that there is no reduction in Emergency Plan effectiveness. However, the revision represents a reduction in commitment without a commensurate reduction in the bases for the commitment; therefore, NRC approval is requested prior to implementation.

Presently, in order to meet the 30-minute time requirement, personnel that are required to be available in 30 minutes are on shift. I&M requests approval of the revision within ninety days to allow reducing the number of personnel required to be on shift. The change from an on-shift to an augmenting position is considered cost beneficial as the on-shift positions are not considered essential, and the change improves the working conditions of the technicians involved.

Enclosure 1 provides a description of the revision and justification for no reduction in CNP Emergency Plan effectiveness. Attachment 1 provides a

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mark-up of the present Planning Standard B, Table 1, "CNP Staffing for Radiological Emergencies," showing the changes to the table. Attachment 2 is the revised CNP Emergency Plan, Planning Standard B, Table 1, "CNP Staffing for Radiological Emergencies." Attachment 3 provides a side-by-side comparison of CNP staffing levels and those identified in Table 1 of NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

This letter contains no new commitments. Should you have any questions, please contact Mr. Brian A. McIntyre, Manager of Regulatory Affairs, at (269) 697-5806.

Sincerely,



J. E. Pollock  
Site Vice President

RGV/jen

Enclosure:

- 1 Description of and Justification for Changes to the Donald C. Cook Nuclear Plant Emergency Plan

Attachments:

- 1 Planning Standard B, Table 1, "CNP Staffing for Radiological Emergencies," Marked to Show Proposed Changes
- 2 Proposed Planning Standard B, Table 1, "CNP Staffing for Radiological Emergencies," from CNP Emergency Plan, Revision 18
- 3 CNP Emergency Plan, Planning Standard B, Table 1, "CNP Staffing for Radiological Emergencies," Comparison to NUREG-0654/FEMA-REP-1, Table B-1

- c: K. D. Curry, AEP Ft. Wayne, w/o enclosure/attachments  
J. E. Dyer, NRC Region III  
MDEQ - DW & RPD, w/o enclosure/attachments  
NRC Resident Inspector  
J. F. Stang, Jr., NRC Washington, DC  
R. Whale, MPSC, w/o enclosure/attachments

**AFFIRMATION**

I, J. E. Pollock, being duly sworn, state that I am Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

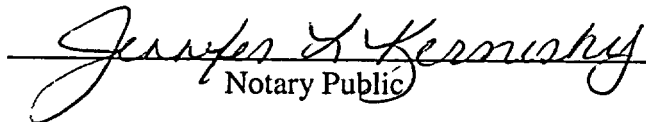
Indiana Michigan Power Company



J. E. Pollock  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 22 DAY OF OCTOBER, 2002



Notary Public

My Commission Expires 5/26/05

**JENNIFER L KERNOSKY**  
Notary Public, Berrien County, Michigan  
My Commission Expires May 26, 2005