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Dear Mr. Dolan:

Docket Nos. 50-315

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50-316

TMI ACTION PLAN ITEMS I.A.1.3, I.C.5, AND I.C.6 AS DESCRIBED SUBJECT: IN NUREG-0737

We have completed our review of the Indiana and Michigan Electric Co. (I&MEC) referenced TMI Action Plan items for the Donald C. Cook Nuclear Plant Unit Nos. 1 & 2. Our conclusions on each item are as follows:

Item No. I.A.1.3 Shift Manning

The Indiana and Michigan Electric Company in a letter dated November 7, 1980, committed to an administrative procedure for the Donald C. Cook facility which complied with the letter of July 31, 1980, from D. G. Eisenhut. This commitment was further clarified and strengthened in their letter dated January 8, 1981 in response to NUREG-0737. This January letter refers to the D. C. Cook Plant Manager Standing Order PMSO .054, dated October 29, 1980, which limits overtime of senior reactor operators, reactor operators and shift technical advisors. The wording of the administrative procedure for items (1), (3), and (4) is substantially that contained in NUREG-0737. The wording of item (2) was changed to read: An individual shall not work greater than 24 hours in any 48 hour period (not including shift turnover time). The licensee has stated that they fully intend to conform to the recommended overtime limits but reserve the right to exceed the limits through cognizant documented management decisions.

In regard to nonlicensed personnel the company policy is not to work more than 16 hours without an eight hour break.

We find the licensee's activities and commitments to this item acceptable.

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Mr. John Dolan

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Item No. I.C.5 Procedure for Feedback of Operating Experience to Plant Staff

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The Indiana and Michigan Electric Company in a letter dated June 20, 1980 which was in response to the May 7, 1980, letter from D. G. Eisenhut committed to review procedures, to assure that operating information pertinent to plant safety is supplied to operators and other personnel. The licensee's letter dated January 8, 1981 in response to NUREG-0737 stated that inplace plant procedures were found to adequately address all requirements for NRC reports and notices and D. C. Cook plant condition reports as required by item I.C.5. New procedures were implemented at the plant to handle non-NRC notices such as those from the Nuclear Steam System Supplier.

D. C. Cook Plant Manager Standing Orders No. PMSO.052, Control of NRC Documents and No. PMSO.057, Information, Evaluation and Utilization of non-NRC Documents, initiated December 30, 1980, address these requirements. Further, the Shift Technical Advisor has been integrated into various plant activities, including review of plant condition reports for trend analysis.

We find the licensee's activities and commitments to this item acceptable.

Item No. I.C.6 Guidance on Procedures for Verifying Correct Performance of Operating Activities

The Indiana & Michigan Electric Company in a letter dated January 8, 1981 responded to the NUREG-0737 recommendations relative to this item.

Plant procedures governing equipment control during surveillance, maintenance and repair activities were reviewed and modified to include the recommended verification activities. A review of licensee activities in this area by Inspection and Enforcement staff personnel found that supervisory operators are kept informed of equipment status important to safety.

We find the licensee's activities for this item acceptable.

Based on the results of our review as outlined above TMI Action Plan Items Nos. I.A.1.3, I.C.5 and I.C.6 are considered resolved for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2.

	signed by:
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Mr. John Dolan Indiana and Michigan Electric Company

cc: Mr. Robert W. Jurgensen Chief Nuclear Engineer American Electric Power Service Corporation 2 Broadway New York, New York 10004

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The Honorable Tom Corcoran United States House of Representatives Washington, D. C. 20515 . . × , • · · . ۰. ۰. . • • ٩ .