APR 1 2 1982;

NRC PDR Local PDR ORB 1 File

DISTRIBUTION

D. Eisenhut OELD

01&E (1)

R. Cilimberg C. Parrish

D. Kers

NSIC

ACRS (10)

J. Heltemes

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

Dear Mr. Dolan:

Docket Nos. 50-315

and 50-316

This is to acknowledge receipt of your letter dated November 30, 1981 which transmitted revised pages to the "Donald C. Cook Nuclear Plant Training and Qualification Plan" in response to our comments of October 9, 1981.

We have reviewed the changes and have determined that, with two exceptions, the changes are acceptable. Our concerns regarding the exceptions are enclosed. It is requested that you submit your response to these concerns within 30 days from receipt of this letter.

Should you have any questions concerning this matter, please contact the reviewer, Dale A. Kers at (301) 427-4010.

Sincerely,

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

Enclosure: As stated

cc w/enclosure: See next page

8204260030

			₹		
OFFICE	ORB 1	ORB 1			
	PCilimbona/n				
DATE	4/6/82	(4/ <i>D</i> /82		 	***************************************
<u>`</u>	<u></u>			L	

• and the second of the second o

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

Gerald Charnoff, Esquire
-Shaw, Pittman, Potts and Trowbridge
1800 M Street, N.W.
Washington, D. C. 20036

Maude Preston Palenske Memorial Library 500 Market Street St. Joseph, Michigan 49085

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 770 Red Arrow Highway Stevensville, Michigan 49127

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 Docket No. 50-315/316

COMMENTS ON THE D.C. COOK SECURITY PERSONNEL TRAINING AND QUALIFICATION (T&Q) PLAN

Section	Page	Comment
1.6, 2.2.5, 2.4 & 4.4	11 15 16 19	The requirement to provide for the retention of training and qualification documentation for a period of two years is defined in NUREG-0674, "Security Personnel Training and Qualification Criteria". This requirement is based on the Office of the Executive Director for Operations' guidance to regional offices requiring an inspection of a facility's physical protection program at least once each year. Therefore, to allow for changes in inspection schedules, which may not correspond to your annual record destruction schedule, your plan must be changed to commit to retaining training and qualification documentation for a period of two years.
4.0	18	10 CFR Part 73, Appendix B. IV states "each individual shall perform night firing for familiarization with assigned weapons." Unless Indiana and Michigan Electric Company wants to request an exemption from this requirement of Appendix B this section of the plan must be revised to include night familiarization firing for shotguns and semi-automatic weapons. It

should be noted that there are no requirements

to meet this requirement. Standard ammunition

aresufficient to meet the requirement. ..

for the use of special ammunition or firing ranges

and firing ranges under night time lighting conditions

Amount portugal and a second second and a second second and a second sec