

October 1, 1982

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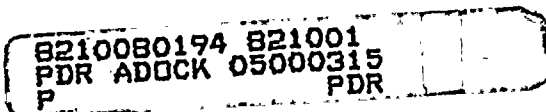
Docket No. 50-315
Docket No. 50-316

American Electric Power Service
Corporation
Indiana and Michigan Electric Company
ATTN: Mr. John E. Dolan
Vice Chairman
Engineering
2 Broadway
New York, NY 10004

Gentlemen:

We have reviewed your regulatory performance improvement program described in your letter (AEP:NRC:0625B) to us of May 13, 1982, and the results of your management reviews conducted over the past year. A summary of our comments on your program as described in Tables 1 through 8 of your letter is as follows:

1. The "OBJECTIVE" statements are accurate restatements of our areas of concern as set forth in Paragraph 3 of our report (50-315/82-06; 50-316/82-06) of our March 16, 1982, management meeting. However, the statements or associated action descriptions do not contain sufficient information to reflect the extent to which you have reviewed these areas and your conclusion as to whether or not you have identified all needed corrective actions. The "OBJECTIVE" statements should summarize the results of your assessment of your problem areas, and include your evaluation of findings from all sources such as INPO, PAS, and your management reviews.
2. Each statement of action should contain sufficient information to show specifically how it relates to attainment of the objective.
3. Each statement of action in progress or planned should include milestones and dates.
4. There should be a description of the method for tracking program progress and designation of individuals responsible for tracking the program.



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October 1, 1982

5. There should be a description of the method you intend to use to measure the effectiveness of your corrective actions and the decision process you will use to adjust your program in the event the actions are not effective.
6. There should be recognition of the vital role training plays in adjusting the attitude of personnel in many areas, especially compliance with NRC requirements and acceptance of your philosophy of "everybody is important, everybody must win or we all lose."

Your management reviews indicate that you have devoted considerable attention to improving the regulatory performance of your organization as it relates to the Donald C. Cook plant. We are pleased that you are continuing your management reviews. It is likely that many of our comments can be dealt with by revising your regulatory improvement program description to take full credit for your management review efforts.

Based on discussions between Messrs. Alexich and Smith of your staff and Mr. Streeter of my staff on September 29, 1982, a meeting has been scheduled for October 14, 1982, at 8:00 a.m. at the Donald C. Cook plant between Messrs. Smith and Miliotti of your staff and Messrs. Swanson and Holzmer of my staff. The purpose of that meeting is to discuss our comments and to answer any questions regarding specific examples that lead to these comments. Further, Mr. Alexich and Mr. Streeter agreed to a tentative November 1, 1982, meeting between themselves and other members of our staffs. The purpose of that meeting is to discuss your views on our comments prior to your submission of a revision to your regulatory performance improvement program which is tentatively scheduled for November 15, 1982.

Your cooperation with us is appreciated.

Sincerely,

Original signed by
James G. Keppler
James G. Keppler
Regional Administrator

cc: W. G. Smith, Jr., Plant Manager
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Ronald Callen, Michigan
Public Service Commission
EIS Coordinator, USEPA
Region 5 Office

RIII
mH for
Swanson/sv
10/1/82

RIII
mH
Holzmer

RIII
Reyes
10/1

RIII
Streeter
10/1

RIII
Spessard
10/1

RIII
Davis
10/1/82

RIII
Keppler
10/1/82

