

Docket Nos. 50-315
and 50-316

September 12, 1985

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ACRS 10

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:

We have reviewed the Procedures Generation Package (PGP) for Emergency Operating Procedures (EOPs) for the Donald C. Cook Nuclear Plant, Units 1 and 2, submitted by letter from M. P. Alexich to H. R. Denton dated September 28, 1984. The Draft Safety Evaluation Report (DSER) is enclosed. Our review determined that the procedure generation program for Cook has several items that should be satisfactorily addressed before the PGP is acceptable. IMEC should address these items in a revision to the PGP, or provide justification for why such revisions are not necessary. Our review of IMEC's response to these items will be included in a subsequent safety evaluation report. The revision of the PGP should not impact the schedule for the use of the EOPs. It is our understanding that the EOP's will be completed before January 1986. Subsequent revision to the EOP's, however, should be done with an acceptable PGP and made in accordance with IMEC administrative procedures and 10 CFR 50.59.

The review of IMEC's PGP is being conducted in accordance with Generic Letter 82-33, Supplement 1 to NUREG-0737. NRC approval of the PGP is not necessary for operating reactors prior to implementing upgraded EOPs. Criteria for this review were not in the Standard Review Plan (SRP) when this review was begun. Therefore, this review was based on NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures," the reference document for the EOP upgrade portion of Supplement 1 to NUREG-0737 (Generic Letter 82-33). Review criteria based on the guidance of NUREG-0899 has now been included in the SRP.

The PGP, as specified in Generic Letter 82-33, consists of four parts: (1) plant-specific technical guidelines, (2) writer's guide, (3) description of the validation/verification program for EOPs, and (4) description of the training program for upgraded EOPs. This DSER identifies the items that must be addressed for us to complete the review of the PGP.

Please provide a schedule for your response to include, if necessary, a meeting to resolve the open issues in the DSER. It is also requested that your response address the schedule and use of the revised PGP for EOP updates and revisions.

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1. The first part of the report deals with the general situation in the country. It is noted that the economy is in a state of stagnation and that the government is unable to meet its obligations. The report also mentions that the population is suffering from a severe shortage of food and that the government is unable to provide for their basic needs.

2. The second part of the report deals with the political situation. It is noted that the government is unable to carry out its policies and that the country is in a state of political instability. The report also mentions that the government is unable to maintain law and order and that the country is in a state of chaos.

3. The third part of the report deals with the social situation. It is noted that the government is unable to provide for the basic needs of the population and that the country is in a state of social unrest. The report also mentions that the government is unable to provide for the education and health care of the population and that the country is in a state of social decay.

4. The fourth part of the report deals with the international situation. It is noted that the country is unable to maintain its relations with the other countries of the world and that the country is in a state of international isolation. The report also mentions that the country is unable to participate in the international community and that the country is in a state of international marginalization.

Mr. John Dolan

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September 12, 1985

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

/s/SVarga

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
As stated

cc:
See next page

ORB#1:DL
CParrish
9/9/85

ORB#1:DL
DWigginton
9/10/85

ORB#5:DL
AEB
FAkstulewicz
9/10/85

BC ORB#1:DL
SVarga
9/12/85

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WASHINGTON, D.C. 20530

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Mr. John Dolan
Indiana and Michigan Electric Company

Donald C. Cook Nuclear Plant

cc:

Mr. M. P. Alexich
Vice President
Nuclear Operations
American Electric Power Service
Corporation
1 Riverside Plaza
Columbus, Ohio 43215

The Honorable John E. Grotberg
United States House of Representatives
Washington, DC 20515

Attorney General
Department of Attorney General
525 West Ottawa Street
Lansing, Michigan 48913

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Township Supervisor
Lake Township Hall
Post Office Box 818
Bridgman, Michigan 49106

J. Feinstein
American Electric Power
Service Corporation
1 Riverside Plaza
Columbus, Ohio 43216

W. G. Smith, Jr., Plant Manager
Donald C. Cook Nuclear Plant
Post Office Box 458
Bridgman, Michigan 49106

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
7700 Red Arrow Highway
Stevensville, Michigan 49127

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

Mayor, City of Bridgeman
Post Office Box 366
Bridgman, Michigan 49106

Special Assistant to the Governor
Room 1 - State Capitol
Lansing, Michigan 48909

Nuclear Facilities and Environmental
Monitoring Section Office
Division of Radiological Health
Department of Public Health
3500 N. Logan Street
Post Office Box 30035
Lansing, Michigan 48909