

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8606060193 DOC. DATE: 86/05/30 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M. P. Indiana & Michigan Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Responds to 8860213 Generic Ltr 86-04, "Policy Statement on Engineering Expertise on Shift." Shift technical advisors rotate onto & are active participants w/operations shift, per NUREG-0737, Item I. A. 1. 1.

DISTRIBUTION CODE: M003D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 3
 TITLE: Operator Requalification Program

NOTES:

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL
	PWR-A PD4 LA		1	0		PWR-A PD4 PD		1	1
	WIGGINGTON, D		1	1					
INTERNAL:	NRR/DHFT/HFIB		1	1		NRR/DHFT/MTB		1	1
	<u>REG FILE</u> 04		1	1		RGN3		1	1
EXTERNAL:	24X		1	1		LPDR 03		2	2
	NRC PDR 02		1	1		NSIC 05		1	1

TOTAL NUMBER OF COPIES REQUIRED: LTTR 12 ENCL 0

CONFIDENTIAL - SECURITY INFORMATION
UNCLASSIFIED

DATE: 10/15/88
BY: [illegible]

[illegible]

CONFIDENTIAL - SECURITY INFORMATION
UNCLASSIFIED

DATE: 10/15/88
BY: [illegible]

[illegible]

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

May 30, 1986
AEP:NRC:0398L

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO GENERIC LETTER 86-04: POLICY STATEMENT
ON ENGINEERING EXPERTISE ON SHIFT

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Keppler:

This letter responds to Generic Letter (GL) 86-04, "Policy Statement on Engineering Expertise on Shift," dated February 13, 1986. GL 86-04 requested that we transmit our plans regarding modifications to our current experts on shift program in light of options now available as a result of the new policy statement on this topic. Included in this letter is the response to that request.

In the subject policy, stress is placed on the importance of providing engineering and accident assessment expertise on shift. It is our understanding the Commission prefers a SRO/STA position. Two options are stated as acceptable in the policy statement:

"Option 1: Combined SRO/STA Position

This option is satisfied by assigning an individual with the following qualifications to each operating shift crew as one of the SROs (preferably the Shift Supervisor) required by 10 CFR 50.54(m)(2)(i):

- a. Licensed as a senior operator on the nuclear power unit(s) to which assigned, and
- b. Meets the STA training criteria of NUREG-0737, Item I.A.1.1, and one of the following educational alternatives:
 - (1) Bachelor's degree in engineering from an accredited institution;
 - (2) Professional Engineer's license obtained by the successful completion of the PE examination;
 - (3) Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences;

8606060193 860530
PDR ADDOCK 05000315
PDR

M003
/0



11.11.11

1. The first part of the document is a list of names and addresses.

2. The second part is a list of names and addresses.

3.

4. The third part is a list of names and addresses.

5.

6.

7.

8.

9. The fourth part is a list of names and addresses.

10.

11.

12.

13.

- (4) Bachelor's degree in a physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences.

Option 2: Continued Use of STA Position

This option is satisfied by placing on each shift a dedicated Shift Technical Advisor (STA) who meets the STA criteria of NUREG-0737, Item I.A.1.1. The STA should assume an active role in shift activities. For example, the STA should review plant logs, participate in shift turnover activities, and maintain an awareness of plant configuration and status."

It is our understanding either Option 1 or 2 may be used on shift. In other words, a utility may use Option 1 on some shifts, and Option 2 on other shifts, or may use the same option on every shift. If Option 1 is used, then the separate STA position may be eliminated for that shift.

The following are responses to your specific questions.

"1. Your current program for providing engineering expertise on shift"

Response: D. C. Cook Plant STAs rotate onto and are active participants with the Operations shifts. Currently there are ten Qualified STAs, with five on shift, and five available for non-shift related activities. In addition, three STAs have successfully passed the SRO examination, two are in training for the SRO examination, and an additional four successfully completed the RO examination. While on shift, the STAs perform the following activities:

- (1) Perform immediate investigation of selected Condition Reports.
- (2) Conduct turnovers, review logs, and keep current in the status of the plant.
- (3) Perform routine tours of the plant.
- (4) Follow control room activities during plant maneuvers, such as set-up, start-up, power changes, cool-down, and degassing.
- (5) Provide on shift accident assessment as required by NUREG-0737.
- (6) Advise the Shift Supervisors on engineering, safety, reportability and compliance issues.

For qualified STAs not attached to an operational shift, the following principal duties are completed:

- (1) Review and condense information from all reactor trips.
- (2) Participate in meetings with AEPSC and fuel vendor personnel to discuss reload safety analyses.



1. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is essential for ensuring the integrity of the financial data and for providing a clear audit trail. The second part of the document outlines the specific procedures for recording transactions, including the use of double-entry bookkeeping and the importance of regular reconciliations. The third part of the document discusses the role of internal controls in preventing errors and fraud, and the importance of a strong internal control system. The fourth part of the document discusses the importance of transparency and communication in financial reporting, and the role of the board of directors in overseeing the financial reporting process. The fifth part of the document discusses the importance of staying up-to-date on changes in accounting standards and regulations, and the role of professional organizations in providing ongoing education and support. The sixth part of the document discusses the importance of maintaining a strong relationship with external auditors, and the role of the auditor in providing an independent opinion on the financial statements. The seventh part of the document discusses the importance of maintaining a strong relationship with investors and other stakeholders, and the role of the company in providing timely and accurate information. The eighth part of the document discusses the importance of maintaining a strong relationship with the media and other public relations outlets, and the role of the company in providing accurate and timely information. The ninth part of the document discusses the importance of maintaining a strong relationship with the government and other regulatory agencies, and the role of the company in providing accurate and timely information. The tenth part of the document discusses the importance of maintaining a strong relationship with the community and other stakeholders, and the role of the company in providing accurate and timely information.

- (3) Coordinate plant participation in Technical Specification amendment preparation and implementation.
- (4) On a part-time basis, spend time in the Corporate Safety and Licensing office assisting with selected safety and licensing issues.
- (5) Collect and collate data for trending and presentation for further analysis.
- (6) Perform immediate reviews and coordinate responses to INPO, Significant Operating Event Reports, and Significant Event Reports.

"2. If your current STA program utilizes an 'equivalency' criteria to an engineering degree, a description of the criteria used"

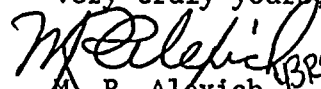
Response: Equivalency criteria will not be used at the Cook Plant. Educational alternatives, as described in Option 1, b., will be followed.

"3. A description of any modifications you intend to propose to your current program in order to take advantage of the options identified in the Commission's Policy Statement"

Response: The Cook Plant will implement both Option 1 and/or Option 2 as stated above. No modifications of these Options are requested at this time.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,


M. P. Alexich ^{BRS} 5/30/86
Vice President

MPA/pm

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Carruth
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman