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August 5, 1997

Mr. E. E. Fitzpatrick
Executive Vice President
Nuclear Generation Group
American Electric Power Company
500 Circle Drive
Buchanan, MI 49107-1395

SUBJECT: NOTICE OF VIOLATION ITEMS (NRC INSPECTION REPORTS
50-315-97003(DRS); 50-316-97003(DRS))

Dear Mr. Fitzpatrick:

This will acknowledge receipt of your letter dated June 30, 1997, in response to our letter dated May 30, 1997, transmitting a Notice of Violation associated with Inspection Reports 50-315-97003(DRS); 50-316-97003(DRS). The report summarized the results of the Licensed Reactor Operator Requalification Inspection at your Donald C. Cook Nuclear Plant, Units 1 and 2.

We have reviewed your corrective actions for the two violations and have determined that your corrective actions are inadequate.

For the first violation, in the "Corrective Actions Taken to Avoid Further Violations" section, no details are given regarding the specific procedures for which the stated actions apply. Additionally, the actions appear to be focused solely on operations procedures; however, PMI-2011 is a plant-wide instruction.

In your response to the second violation, you attribute the cause of the violation to the lack of an in-depth review of NUREG-1262 when changing the licensed operator requalification program. The corrective actions for the violation apply specifically to the requalification program; however, these actions appear narrowly focused when considered with previously documented findings. Other NRC inspection reports and your own audit program, in SURV-97-135, have identified past problems with the failure to perform an adequate review of procedure/program changes against source documents. These concerns were verbally given to Mr. John Sampson, Plant Manager, by Mr. Bruce Bartlett, NRC Senior Resident Inspector on July 9, 1997. We understand that you intend to respond to these concerns as part of your additional response to inspection report 50-315/316-97002. As such, no additional response to this letter is required pending our review of your latest response to inspection report 97002.



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E. E. Fitzpatrick

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August 5, 1997

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and the enclosure may be placed in the NRC Public Document Room (PDR).

Sincerely,

John A. Grobe, Acting Director
Division of Reactor Safety

Docket Nos. 50-315; 50-316
Licenses No. DPR-58; DPR-74

Enclosure: Ltr dtd 06/30/97 E. E. Fitzpatrick
AEPC to US NRC

cc w/o encl: A. A. Blind, Site Vice President
John Sampson, Plant Manager

cc w/encl: James R. Padgett, Michigan Public
Service Commission
Michigan Department of Public Health

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Sincerely,

John A. Grobe, Acting Director
Division of Reactor Safety

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AEPC to US NRC

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