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SUBJECT: Forwards Rev 15 to "DC Cook Nuclear Plant Units 1 & 2
Emergency Plan," incorporating changes re relocation of
nuclear generation personnel from AEP corporate headquarters
in Columbus, OH to Southwest MI.

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Indiana Michigan
Power Company
500 Circle Drive
Buchanan, MI 49107 1395



**INDIANA
MICHIGAN
POWER**

June 5, 1997

AEP:NRC:0824P
10 CFR 50.57(b)(16)

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
EMERGENCY PLAN, REVISION 15

Attached are two copies of revision 15 to Cook Nuclear Plant's emergency plan. This revision incorporates changes to our emergency plan that have developed since revision 14 was submitted, and includes changes related to relocation of nuclear generation personnel from American Electric Power corporate headquarters in Columbus, Ohio, to Southwest Michigan.

Attachment 1 contains an assessment of acceptability as suggested by the Nuclear Energy Institute. Based on the assessment, we have concluded these changes do not decrease the effectiveness of the emergency plan. Attachment 2 contains a description of the changes to the emergency plan in this revision. Attachment 3 contains revision 15 of the emergency plan.

Two copies of revision 15 have also been forwarded to the NRC Region III office as required by 10 CFR 50.4(b)(5).

Please sign and return the attached document control acknowledgment letter for our records.

Sincerely,

E. E. Fitzpatrick
Vice President

vlb

Attachments

c: A. A. Blind
A. B. Beach (2)
MDEQ - DW & RPD
NRC Resident Inspector
J. R. Padgett

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**INDIANA
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May 5, 1997

AEP:NRC:0824P
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Vice President

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c: A. A. Blind
A. B. Beach (2)
MDEQ - DW & RPD
NRC Resident Inspector
J. R. Padgett

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ATTACHMENT 1 TO AEP:NRC:0824P

ASSESSMENT OF ACCEPTABILITY OF EMERGENCY PLAN CHANGES

This memo documents an assessment of acceptability of emergency plan (revision 15) changes per 10 CFR 50.54(q). The criteria used were presented in a draft Nuclear Energy Institute (NEI) industry white paper (4/10/96) and consist of three questions to be applied to all emergency plan changes. The three questions and answers relative to revision 15 of the emergency plan are as follows.

DOES THE CHANGE DECREASE THE EFFECTIVENESS OF THE PLAN RESULTING IN THE LOSS OF REASONABLE ASSURANCE THAT ADEQUATE PROTECTION CAN AND WILL BE TAKEN IN THE EVENT OF A RADIOLOGICAL EMERGENCY AS REQUIRED BY 10 CFR 50.47 (a)?

Yes _____ No X

Many of the emergency plan changes in revision 15 relate to the relocation of the nuclear generation group (NGG) corporate staff from AEP headquarters in Columbus, Ohio, to Michigan. Concurrent with this relocation, emergency response organization (ERO) members from the corporate staff have been integrated into the site ERO.

Some emergency response functions have become unnecessary as a result of this move. The initial assessment group (IAG) had been responsible for making a determination of the need for corporate support and the extent of that support. Because all NGG personnel are now located at the plant site or in close proximity at the NGG headquarters building in Buchanan, MI, this function is no longer required. The IAG became the corporate support group (CSG) following the arrival at the emergency operations facility (EOF) of senior management from the corporate office. The CSG acted as a liaison between the site ERO and the corporate staff and also with outside agencies such as INPO and American Nuclear Insurers (ANI). This function is now performed by the headquarters support group (HSG).

The above changes do not result in a decrease in the effectiveness of the plan because they should result in a more timely mobilization of the NGG resources needed to support the site ERO in the event of an emergency.

The AEPSC and the I&M emergency response manuals (ERMs) were discontinued and applicable sections incorporated into the new AEP emergency response manual (ERM). The AEPSC manual detailed the duties and responsibilities of the corporate staff in the event of an emergency. Most of the procedures became obsolete with the corporate move, including those for the IAG. The I&M manual contained procedures for personnel who would man the emergency news center and the joint public information center (JPIC). Those procedures were reviewed and revised as necessary before being combined with the relevant AEPSC procedures in the new manual. As these procedures were updated to reflect organizational changes, including those mentioned above, and to respond to requests to make the I&M procedures more user friendly, these changes do not decrease the effectiveness of the plan.

Section 12.3.1.5 of the plan contained a definition of emergency action levels (EALs), with wording indicating that EALs could initiate protective actions. EALs determine the appropriate emergency classification level, but do not determine protective action recommendations. The deletion of that wording in revision 15 is consistent with our current emergency classification procedure, PMP 2080 EPP.101, "Emergency Classification", and the

definition of EALs found in NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels". It therefore does not decrease the effectiveness of the plan.

In section 12.3.1.5 there is also a definition of "state field team center" (FTC), (definition #12), that references the department of health, radiological health division. This reference is being changed to the department of environmental quality, drinking water and radiological protection division. This reflects a reorganization of duties among state agencies. Because all duties relating to nuclear emergencies have been transferred from the former radiological health division to the drinking water and radiological protection division, there is no decrease in the effectiveness of the plan. This change in responsibilities at the state level is reflected in other plan sections as noted in the attached description of changes.

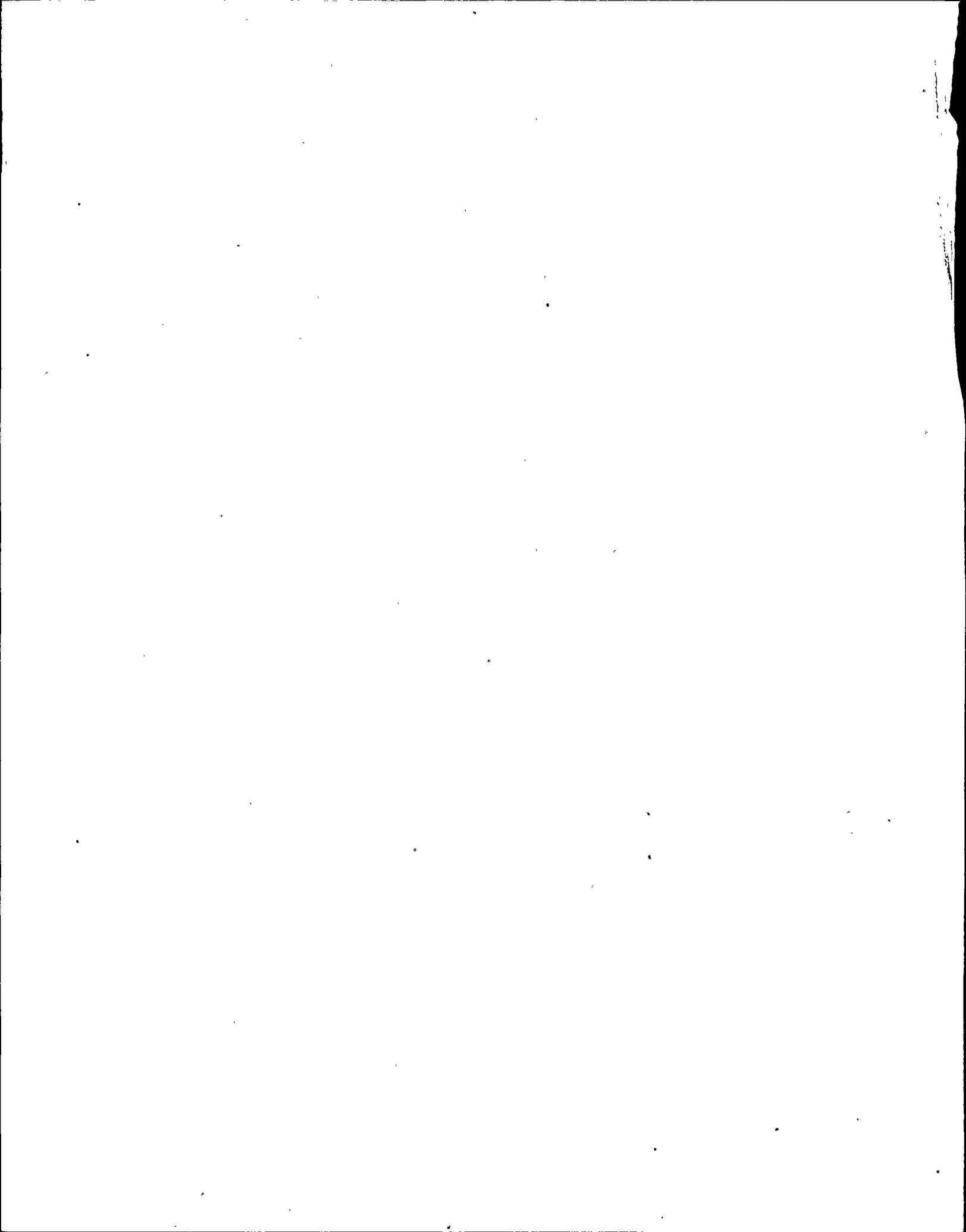
Changes were made to the numbering of figures in the plan to account for a figure that had been deleted in an earlier revision (figure 12-1). All organization and communication flow charts have been revised to reflect the current NGG organization. No ERO positions were eliminated and qualified personnel remain available to fill all positions, so there is no decrease in effectiveness of the plan due to these changes.

The location of the state emergency operations center (SEOC) (definition #17 in 12.3.1.5) was updated. Because only the location changed and there was no change in the actions performed by the state, there is no decrease in the effectiveness of the plan.

Section 12.3.3.3.1 was modified to show that the HSG manager (formerly the IAG manager) establishes contact with the technical support center (TSC) as well as with the engineering design and site services manager. This documents an additional line of communication that is, in fact, normally used by the ERO. It therefore does not decrease the effectiveness of the plan.

Section 12.3.3.4 was rewritten to clarify the description of the activation of the JPIC. The new description notes that the JPIC may be activated if the state declares a state of disaster or emergency, or if there is potential for rapid escalation of the incident even if a site area emergency has not been declared. References to the IAG and I&M public affairs have been deleted. Communications will be with corporate communications-generation rather than I&M public affairs. These changes do not decrease the effectiveness of the plan.

Section 12.3.3.5.2 discusses the person responsible for contacting the Michigan state police (MSP). Previous to this revision, that responsibility was attributed to the plant manager; however, it is appropriate for the site emergency coordinator (SEC) to make that contact, and the SEC may be the plant manager or a qualified alternate. This is only a clarification of the notification process, so it does not decrease the effectiveness of the plan. In the last paragraph, the location of the FTC is changed from MSP Post #57 in St. Joseph, Michigan, to the St. Joseph district service center on Meadowbrook Road. This change resulted in an improvement in the facilities available to the MSP for the FTC, so it does not decrease the effectiveness of the plan.



In section 12.3.3.5.3, NGG management was substituted for plant manager when describing who may request aid from the department of energy, because other persons in NGG may be making the request. This change does not decrease the effectiveness of the plan because a person with similar qualifications will be available to make this request.

The fire protection shift supervisor replaced shift supervisor (SS) as the person responsible for fire fighting activities, on site, in section 12.3.3.5.4. This relieves the SS of one of his emergency response activities, providing for less distraction from operation of the plant, while leaving a qualified individual in charge of fire fighting activities. For these reasons, this change does not decrease the effectiveness of the plan.

Section 12.3.3.5.5 was changed to update the names of the documents listing contractors available to provide emergency spill response assistance (non-radiological). The new documents, spill prevention control and counter-measure plan (SPCC plan) and pollution incident plan (PIP plan), contain updated information similar to that in the old document, so this change does not decrease the effectiveness of the plan.

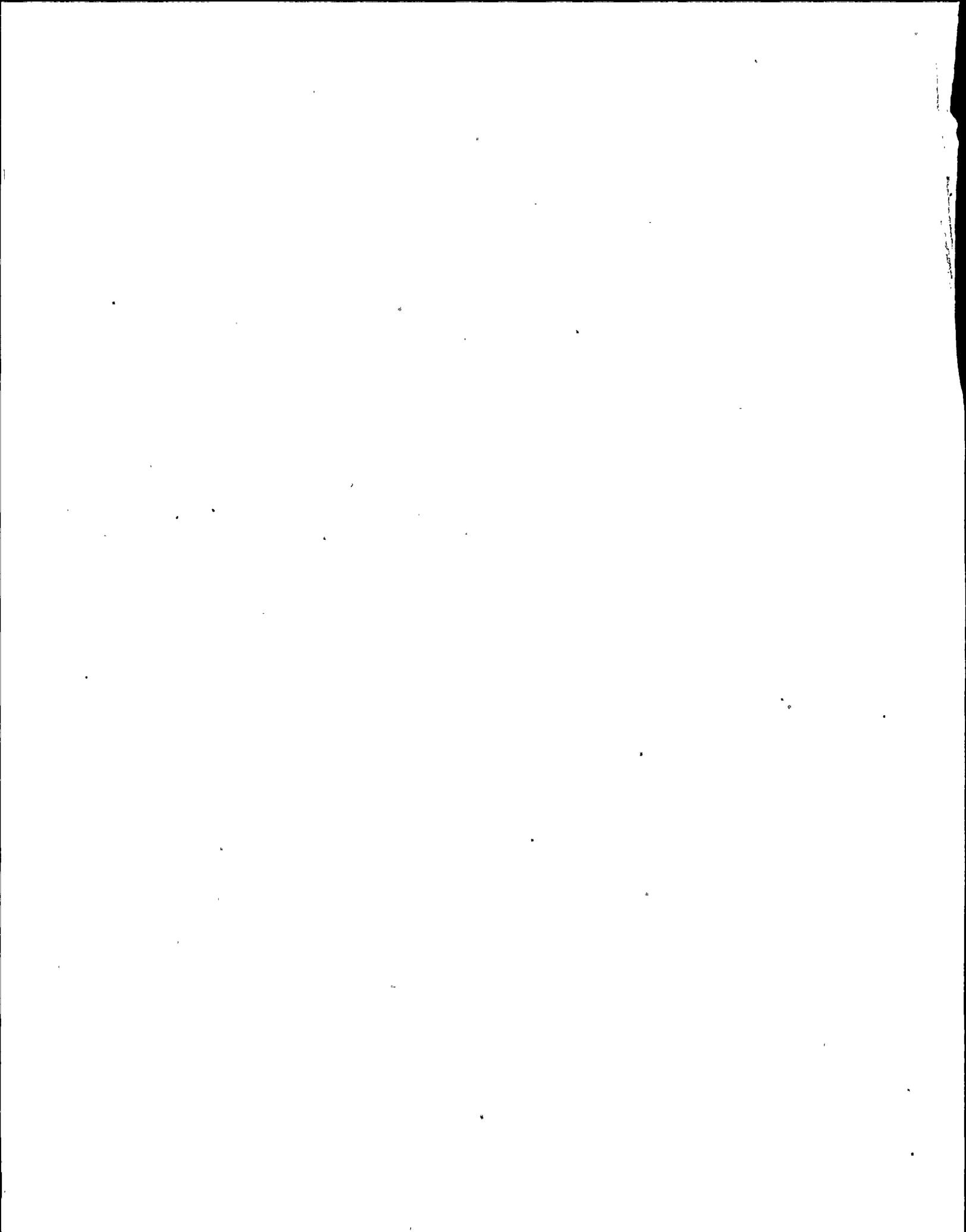
Section 12.3.3.8 was revised to state that details of the voluntary assistance agreement are included in the AEP ERM rather than emergency plan procedures. The INPO liaison (who is the person responsible for requesting assistance through the INPO mutual assistance agreement) is described in the ERM, so this change does not decrease the effectiveness of the plan.

Section 12.3.5 was revised to incorporate a new emergency classification system based on guidance developed in NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels". The proposed emergency classification system was submitted to the Nuclear Regulatory Commission (NRC) for final review and approval in October 1996. In a letter dated October 26, 1996, the NRC signified its approval of the new classification system as an acceptable method for meeting the requirements of 10 CFR 50.47(b)(4) and Appendix E to 10 CFR Part 50. This new emergency classification system, therefore, will not decrease the effectiveness of the emergency plan.

Section 12.3.6.1.2 discusses the initial calls to be made by the SEC after the declaration of an emergency. It was revised to show that the site vice president rather than the site vice president/plant manager is called by the SEC. This reflects an organizational change that separated those functions into two positions. Both the site vice president and the plant manager are on the call-out list with the site vice president being the first on the list, the plant manager second. This change does not decrease the effectiveness of the plan because the highest ranking company official on site is still the first person on this list to be called.

The change in section 12.3.6.1.3 reflects organizational changes mentioned previously. Because the IAG manager is now an obsolete position, a reference to the SEC calling the IAG manager is not necessary, so this change does not decrease the effectiveness of the plan.

Changes in section 12.3.6.2 include minor editorial changes and



clarifications. Also, a statement giving instructions to personnel in or near the training building to report to the gatehouse at the main access road in the event of a plant evacuation was deleted and a statement giving the same instructions for personnel in the switchyard was modified. According to emergency plan procedures, personnel outside the protected area will be instructed by the SEC to assemble off-site or to go home. That process will help prevent congestion in the main access road while ensuring prompt evacuation of non-essential personnel. For these reasons, these changes do not decrease the effectiveness of the plan.

In section 12.3.6.4, a reference to evacuation time estimates for an 8 mile radius was deleted. No regulatory requirement exists for maintaining estimates for that distance. Also, a description of the emergency warning system was changed from "fifty sirens located throughout the 10 mile EPZ" to "sirens located throughout the 10 mile EPZ". The siren system is currently being upgraded, with some old sirens still in operation along with newer replacement sirens. The use of a fixed number to describe the siren system is not appropriate because the number will be changing as old ones are taken out of service. As the transition takes place, telecommunications personnel perform tests as necessary to ensure that the entire population of the EPZ is covered by the emergency warning system. These changes do not decrease the effectiveness of the plan.

Section 12.3.7.2.2 was revised to reflect the change in location for the field team center. This change was discussed previously in this memo and does not decrease the effectiveness of the plan.

In section 12.3.8.1, a reference to I&M public affairs director distributing emergency education information was deleted. The Cook Energy Information Center manager performs that function, so this does not change the process for distributing emergency education information and does not decrease the effectiveness of the plan.

In section 12.3.8.5, a reference to the title of the person who serves as the JPIC set-up coordinator was removed and replaced with a reference to the AEP ERM. The list of persons who fill that role are located in that manual. They will all be trained and properly qualified for that position, so this change does not decrease the effectiveness of the plan.

Section 12.3.8.6 was revised to say the St. Joseph district service building "may serve as a processing and logistics center for incoming utility and industry representatives," rather than "will serve as...". With the corporate relocation, this facility may not be needed. This change does not decrease the effectiveness of the plan because there is less of a need for such a processing center following the corporate relocation.

Section 12.3.9.2.1 was changed to reflect the current procedure for establishing EOF management. It previously described the EOF being managed by a senior plant person and later by corporate management. As mentioned previously, all NGG personnel have been integrated into a single ERO. This change does not decrease the effectiveness of the plan.

In section 12.3.9.5.2.1, a reference to the chlorine leak detection system was deleted because that system has been abandoned per 12DCP-0051, "Abandon Control Room Chlorine Detectors". The safety

significance of that change was addressed in the design change package (there was no adverse safety affect), so this does not decrease the effectiveness of the plan.

References to the radiological environmental monitoring program (REMP) were deleted from sections 12.3.9.5.3.1 and 12.3.9.8. All such information is contained in the offsite dose calculation manual (ODCM), so this change does not decrease the effectiveness of the plan. It will eliminate duplication of effort because only the ODCM will need to be updated to reflect changes to the REMP.

Section 12.3.10.2 had changes related to the corporate relocation, and a deletion of references to the dose assessment program (DAP) calculating dose rates for liquid releases. That capability has been deleted from DAP. Dose rates are not required for classifying an emergency resulting from a liquid release, so this change does not decrease the effectiveness of the plan. The location of files containing information on DAP was also changed from radiological support section files to emergency plan files.

Several changes were made relating to the post accident sample collection system. A reference to a back-up post accident sampling location was added to 12.3.10.3, and a description of its location was added to 12.3.10.3.1. A list of procedures detailing post accident sampling was deleted and replaced with a general statement describing those procedures. That approach is consistent with the rest of the emergency plan that does not generally list specific procedure names. The changes dealing with the back-up system add information and do not affect the description of the primary post accident sampling system. These changes, therefore, do not decrease the effectiveness of the plan.

Section 12.3.12.2 was changed to reflect changes in emergency dose limit guidance for both life saving and non-life saving situations. The new limits are based on guidance from EPA 400 R-92-001, "Manual Of Protective Action Guides And Protective Actions For Nuclear Incidents", so they do not decrease the effectiveness of the plan.

Letters of agreement with off-site agencies that will provide assistance in the event of an emergency at Cook Nuclear Plant were updated in appendix C. These updated letters will not decrease the effectiveness of the plan.

In appendix D, the names of the hospitals where emergency kits and equipment are located were updated. Also, a reference to the radiation protection procedure that contains the details of the equipment inventories was deleted. The hospital name change reflected an organizational change only and did not change the actual locations or resources available, while the procedure reference was not necessary to ensure that the inventories were completed satisfactorily. These changes, therefore, do not decrease the effectiveness of the plan.

All other changes were considered to be clarifications, minor editorial changes, or related to the corporate relocation (e.g., I&M changed to AEP), not needing any further explanation or justification. By their nature, they will not decrease the effectiveness of the plan.

DOES THE CHANGE RESULT IN THE LOSS OF ABILITY TO MEET ANY OF THE STANDARDS OR APPLICABLE REQUIREMENTS DESCRIBED IN 10 CFR 50.47(b) AND (d) OR ANY NRC-APPROVED ALTERNATIVES TO THOSE STANDARDS AND REQUIREMENTS?

Yes _____ No x

All of the above changes for which explanations were offered (after question #1) were examined relative to the requirements of 10 CFR 50.47(b) and (d) to determine the answer to question #2. In no case did any of the changes result in the loss of ability to meet any of the applicable standards or requirements.

DOES THIS CHANGE DELETE OR CONTRADICT ANY OTHER REGULATORY REQUIREMENT?

Yes _____ No x

We do not believe the above changes to the emergency plan delete or contradict other regulatory requirements.

ATTACHMENT 2 TO AEP:NRC:0824P
CHANGES TO EMERGENCY PLAN (REVISION 15)

Emergency Plan Section/Description of Change

- 12.3.1.3 Deleted reference to AEPSC and I&M emergency response manuals (ERMs), replaced with reference to AEP emergency response manual (ERM), that superceded them.
- Changed AEPSC and I&M personnel to AEP personnel.
- 12.3.1.5 Figure 12-5 changed to 12-4. All figure numbers are being changed to account for a figure deleted from the emergency plan in a previous revision.
- Replaced corporate support group (CSG) with headquarters support group (HSG); this replaces the former group following the corporate relocation from Columbus, Ohio, to Michigan.
- Under definition of emergency action levels, deleted words indicating they could initiate protective actions. Protective actions are initiated based on protective action guides.
- Under definition of state field team center, replaced reference to department of health, radiological health division with department of environmental quality, drinking water and radiological protection division.
- Updated location of state emergency operations center (SEOC) (definition #17).
- Replaced initial assessment group with HSG in definition of technical support center (TSC), updated figure number (figure 12-6 became 12-5).
- Rewrote first sentence of second paragraph of definition for greater clarity.
- Deleted note formerly on page 12.3-7 that described the deletion of a figure. References to that figure have now been removed and all other figure numbers adjusted accordingly.
- 12.3.2 Changed figure number from 12-2 to 12-1, based on previous discussion of renumbering of figures.
- Replaced department of health with environmental quality in figure 12-1.
- Under plant owner/operator, on (new) figure 12-1, changed "site emergency organization" to "site emergency response organization (SERO)".
- 12.3.3 This section contains numerous changes related to organizational changes, including those resulting from the corporate relocation from Columbus, Ohio. These changes included replacing the senior vice president nuclear generation with executive vice president nuclear generation, separation of the site vice president and plant manager functions,

elimination of the assistant plant manager positions, change of department heads from superintendents to managers, addition of work control manager position, updated lists of alternates for site emergency coordinator (SEC) and technical director, and replacement of IAG positions with corresponding HSG positions. Several other emergency positions were updated to reflect current organizational titles for both primaries and alternates.

References to the AEPSC emergency response group were deleted because that group no longer exists as a separate entity from the plant emergency response organization (ERO).

In the parts of this section dealing with off site agencies, the location of the SEOC was updated, and the department of health was replaced with the department of environmental quality.

All organization and flow charts at the end of this section were modified to reflect the above mentioned title and organizational changes.

- 12.3.3.3.1 Added wording to indicate the HSG Manager establishes contact with the TSC as well as the engineering, design and site services manager upon activation of the HSG.
- 12.3.3.2 In the third paragraph, there is a discussion of the shift supervisor (SS) calling upon additional members of the plant organization, referencing an organization chart to define who might be called upon. Because the chart does not include all plant workers, the reference has been made more general to show that the SS may call upon anybody in the plant organization as needed.
- 12.3.3.5.2 Changed reference to plant manager contacting Michigan state police to SEC making the contact. The SEC could be someone other than the plant manager.
- 12.3.3.3.11 Deleted paragraph discussing function of the CSG manager. This function (somewhat modified) is now performed by the HSG manager and is discussed in 12.3.3.3.1.
- 12.3.3.4 This section was rewritten to clarify the process of activating the joint public information center (JPIC).
- 12.3.3.4.3 Changed I&M public affairs director to director of corporate communications (generation). This section was formerly 12.3.3.4.4.
- 12.3.3.4.8 Replaced telecopying with faxing (this section is now 12.3.3.4.7).
- 12.3.3.5.2 In paragraph following list of state support response agencies, changed reference to plant manager to SEC

because others besides the plant manager may perform that function.

12.3.3.5.3 This section discusses requests for federal aid. Plant manager was replaced with NGG management because other persons in NGG may be making the request.

12.3.3.5.4 Replaced SS with fire protection shift supervisor as person responsible for fire fighting activities on site.

Deleted second paragraph because it was confusing.

12.3.3.5.5 Updated name of document listing names of contractors available to provide emergency spill response assistance.

12.3.3.8 Revised sentence stating that implementation details of voluntary assistance agreement are incorporated into emergency plan procedures. The contact information for the voluntary assistance agreement is included in the AEP ERM.

12.3.4.1 Second sentence of paragraph beginning with "Through the federal radiological monitoring and assessment program (FRMAP)..." was rewritten for greater clarity, and reference to FRMAP changed to federal radiological emergency response plan (FRERP), the new plan to coordinate federal radiological assistance.

12.3.4.8 Replaced "telecopying" with "faxing".

12.3.5 Replaced entire section with a new section 12.3.5 based on an emergency classification system using the NUMARC emergency action level (EAL) methodology.

12.3.6.1.2 Changed site vice president/plant manager to site vice president.

12.3.6.1.3 In the seventh paragraph, changed notification of the IAG manager to notification of the executive vice president nuclear generation.

12.3.6.2 Deleted reference to AEPSC ERO.

Changed list of "all the company officials" to "all appropriate company officials".

Added title of PMSO.150, "Emergency Response Organization (ERO) Call-Out List".

Deleted statement that individuals in the training building would report to the gatehouse on the main access road in the event of a plant evacuation. Per emergency plan procedures, the people outside the protected area will be instructed by the SEC to assemble off-site or to go home.

12.3.6.4 In second paragraph, deleted "8 mile". The county plan does not contain evacuation time estimates for

an 8 mile radius from the plant.

Deleted reference to "50" sirens. Now reads, "sirens located throughout the 10 mile EPZ".

In the last sentence of this section, changed "booklet" to "emergency preparedness brochure/calendar".

12.3.7 In the first paragraph, changed "AEPSC IAG" to "AEP personnel".

12.3.7.2.1 "I&M" microwave system changed to "AEP".

12.3.7.2.2 Updated location of state police post from St. Joseph to Bridgman.

12.3.7.2.3 Changed name of local provider of telephone lines to GTE from Alltel.

12.3.7.3 In table of communications capabilities, added off-site radios to control room, deleted OPX and private lines from the plant manager's office.

Changed Benton Harbor to St. Joseph district service center, and Michigan Bell to Ameritech (local telephone service provider for the EOF).

12.3.7.4 First sentence broken down into two sentences for greater clarity.

In fifth paragraph, deleted reference to AEPSC ERO. Added "or designee" to allow designated person other than SEC to notify the NRC.

Changed "list of all company officials" to "list of appropriate company officials".

12.3.7.6 Updated locations of local state police post, NRC headquarters and NRC region III offices.

Changed name of telephone company from Alltel to Ameritech.

12.3.7.7 After the phrase "Information transmitted to the NRC must be approved...", added the words "... by the appropriate emergency response management personnel".

12.3.7.8 In the second sentence, substituted "FTS line" for "system".

12.3.7.9 In the last sentence, changed time interval for update of data on emergency response data system from "15 second intervals" to "approximately 5 second intervals".

12.3.8.1 Deleted reference to I&M public affairs director distributing emergency education information.

12.3.8.2 Deleted reference to I&M public affairs, added reference to corporate communications.

- 12.3.8.4 Same as above comment.
- 12.3.8.5 Referred to AEP ERM to identify who the JPIC set-up coordinator is rather than name that person (by position) directly.
- 12.3.8.6 Changed wording regarding use of Benton Harbor service building (now St. Joseph district service building) to "may serve".
- Changed reference to I&M providing security to AEP providing security.
- 12.3.8.10 Changed I&M to AEP.
- 12.3.9.1.4 Changed IAG to HSG. Deleted words saying TSC will be in communication with HSG (IAG) during initial phase of event until EOF is activated. Communication will continue after EOF is activated.
- 12.3.9.1.5 Personal Computer, added EOF as a location for dose assessment program (DAP).
- 12.3.9.2.1 Second paragraph, changed wording to reflect current procedure for establishing EOF management.
- 12.3.9.2.3 Changed "senior member of plant or corporate staff" to "senior member of nuclear generation group staff".
- 12.3.9.2.4 Changed "I&M" to "AEP".
- Also deleted discussion of DAP calculating maximum permissible concentrations for liquid releases. DAP no longer has that capability.
- 12.3.9.4 Deleted discussion of IAG function.
- 12.3.9.4.1 Deleted IAG function, replaced with HSG function.
- 12.3.9.4.2 Replaced IAG manager with executive vice president nuclear generation.
- Added word omitted at end of second paragraph (support).
- Third paragraph, changed senior plant person to senior nuclear generation group person (referring to manager of EOF).
- Deleted fourth, fifth and sixth paragraphs that discussed IAG function regarding decisions on staffing and travel to plant by corporate personnel, and turnover of EOF to corporate personnel.
- Changed AEPSC emergency response organization to AEP ERO.

- 12.3.9.4.3 Deleted reference to final ERO being comprised of AEPSC personnel and consultants.
- Changed sentence saying, "EOF obtains all its information on plant status from the TSC" to "...from the TSC and the PPC".
- Changed engineering design and construction manager to engineering design and site services manager.
- Changed IAG to HSG.
- 12.3.9.5.2.1 Deleted chlorine leak detection system. This system was abandoned per 12DCP-0051.
- 12.3.9.5.3.1 Corrected typos.
- Deleted references to figures 12-6 and 12-7, radiological environmental sampling program sampling station locations.
- 12.3.9.8 Removed information concerning radiological emergency management program (including figures and table at end of this section). Instead, made reference to offsite dose calculation manual containing this information.
- 12.3.10.2 Removed reference to decisional aids for dose assessment being in IAG.
- Removed references to AEP ERO and DAP calculating dose rates for liquid releases.
- Changed Rad support files to emergency plan files for location of DAP information.
- 12.3.10.3 Added reference to back-up post accident sample collection system.
- 12.3.10.3.1 Added information on location of the back-up post accident sampling system.
- 12.3.10.3.2 Deleted specific names of procedures related to post accident sample collection system.
- 12.3.10.4 At end of list of radiation monitoring system channels, changed "analog system" to "Westinghouse System", and "Digital System" to "Eberline System". Also deleted "Particulate, Iodine and Noble Gas" from the Westinghouse column. Added "Flow Indication" under "Eberline System".
- 12.3.11.3 Rewrote last paragraph to improve clarity.
- 12.3.11.4 Rewrote first paragraph for greater clarity.
- 12.3.11.8 Removed reference to IAG room.
- 12.3.12.2 Changed emergency dose limit guidance to 10 rem and 25 rem total effective dose equivalent for non-life saving and life saving situations respectively, and

- to 100 rem and 250 rem committed dose equivalent thyroid for the same situations. These numbers are from EPA-400.
- 12.3.12.6 Changed department of health to department of environmental quality.
- 12.3.13.1 Changed name of ambulance service.
- 12.3.13.2 Corrected names for primary and back-up hospitals.
Rewrote last sentence of seventh paragraph for clarity.
- 12.3.14.2.2 Deleted superfluous wording in second paragraph.
Deleted reference to 10 CFR 20 limits. Other federal limits might apply.
- 12.3.15.1 Removed reference to AEP ERO training.
Removed references to monthly phone checks with department of health, quarterly checks with department of energy regional office.
- 12.3.16.1 Deleted reference to training of AEP ERO. Coordination of off-site plans made this the responsibility of the site vice president rather than the senior vice president nuclear generation.
- 12.3.16.2 Site vice president/plant manager changed to site vice president for approval of changes to the emergency plan.
Changed senior vice president nuclear generation to executive vice president nuclear generation.
Removed reference to corporate management review of audit results.
- 12.3.16.5 Removed reference to AEPSC.
- Appendix C Updated letters of agreement with off-site agencies (Berrien County Sheriff's Department, Michigan State Police, Lake Township Fire Department, City of Bridgman Fire Department, Medic 1 Community Emergency Services, and Institute of Nuclear Power Operations).
- Appendix D Updated names of hospitals where emergency equipment is located; deleted reference to procedure describing the process for inventorying that equipment.
- Appendix F Radio frequency used for contacting the Berrien County sheriff's office was updated (changed to 465.275 MHz).