



**INDIANA & MICHIGAN ELECTRIC COMPANY**

DONALD C. COOK NUCLEAR PLANT  
P.O. Box 458, Bridgman, Michigan 49106  
(616) 465-5901

November 11, 1981

Mr. J.G. Keppler, Regional Director  
Office of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137



Operating License DPR-74  
Docket No. 50-316

Dear Mr. Keppler:

Pursuant to the requirements of the Appendix A Technical Specifications, the following updated LER is being submitted:

RO 81-044/03X-2.

The following explains the reason for not reporting these items of noncompliance in the time frame specified by the Plant's Technical Specification:

The schedules proposed in the Bulletin for compliance were found to be too short a time to perform the required work either at AEP or at many other utilities. This fact eventually became apparent to all parties involved in the program. Our efforts to address the Bulletin requirements provided that whenever a significant nonconformance was identified, its impact on system operability (what we believed to be the main intent of IE Bulletin 79-14) would be analyzed and, if such was in jeopardy, the reporting requirements were complied with in short time. It was this mechanism that resulted in our initial reports to you (LER Nos. RO 79-050/01T-0, RO 79-065/01T-0, RO 79-049/01T-0). Paragraphs 2 and 4.a of the Bulletin could be interpreted as requiring that if the nonconformance identified did not affect the operability of the system, there was no need for immediate report, but that it could be summarily reported at the end of the whole program. It was our intention to submit to your Office such summary report once we considered the program closed. As the Bulletin related efforts extended themselves both in time and in magnitude, our emphasis shifted more toward the performance of analysis and the development and implementation of fixes. Also, there were a large number of parties involved in the effort (inside and outside AEP), an unavoidable time lag (particularly large in a time when industry resources were stretched to the limit) between the discovery of the nonconformance and the completion of the analysis, and, finally, the need to address concurrently several other NRC requirements.

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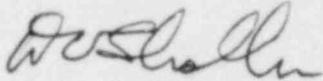
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I regret any inconvenience that this matter might have caused you.

Sincerely,



D.V. Shaller  
Plant Manager

/bab

cc: J.E. Dolan  
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