DMB

November 15, 1982

Docket No. 50-315 Docket No. 50-316

American Electric Power Service Corporation Indiana and Michigan Electric Company ATTN: Mr. John E. Dolan Vice Chairman Engineering 2 Broadway New York, NY 10004

Gentlemen:

This refers to the routine safety inspection conducted by Messrs. W. L. Axelson and T. J. Ploski and Ms. M. Smith of this office on October 20-22, 1982, of activities at the D.C. Cook Nuclear Power Plant authorized by NRC Operating Licenses No. DFR-58 and DPR-74 and to the discussion of our findings with Mr. Smith and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

Within the scope of the inspection, no violations or deviations were identified. However, weaknesses were identified which will require corrective action by your staff. These weaknesses are listed in attached Appendix A to this letter and were discussed, in detail, with your staff at the joint critique held October 22, 1982, at the Cook site. Accordingly, you are requested to submit a written statement within twenty five days of the date of this letter describing your planned actions for improving each item identified in Appendix A.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractors) believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within ten (10) days from the late of this letter of your intention

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to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven (7) days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

The responses directed by this letter (and the accompanying Appendix) are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

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J. A. Hind, Director Division of Emergency Preparedness and Operational Support

Enclosures:

- Appendix A, Exercise Weaknesses
- 2. Inspection Report No. 50-315/82-18(DEPOS); and No. 50-316/82-18(DEPOS)

cc w/encls: W. G. Smith, Jr., Plant Manager DMB/Document Control Desk (RIDS) Resident Inspector, RIII Ronald Callen, Michigan Public Service Commission EIS Coordinator, USEPA Region 5 Office FEMA, RV, Dan Bement

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APPENDIX A

EXERCISE WEAKNESSES

The following is a summary of significant weaknesses observed during the exercise. Additional details are provided in the referenced sections of this inspection report. Other weaknesses of comparatively lesser significance are identified only in the appropriate sections of this report.

- Workspace in the TSC technical support room is still inadequate. (Section 4b) (50-315/82-18-01; 50-316/82-18-01)
- Status boards in the TSC communications room are not readily visible to decision makers in the technical support room and should, therefore, be provided in both rooms. (Section 4b) (50-315/82-18-02; 50-316/82-18-02)
- Reactor equipment status boards in the TSC and the EOF are inadequate. Protective measures status boards are not available in the TSC and EOF. (Sections 4b and 4c) (50-315/82-18-03; 50-316/82-18-03)
- 4. Procedure PMP 2081 EPP.022 does not require the EOF Recovery Manager to formally approve protective action recommendation or changing recommendation messages prior to their release to offsite authorities. (Section 4c) (50-315/82-18-04; 50-316/82-18-04)
- The present procedure for formulating protective action recommendations does not provide for incorporating evacuation time estimates into the decision making process. (Section 4c) (50-315/82-18-05; 50-316/82-18-05)
- 6. A status board displaying current personnel assignments in the emergency organization is not available in the EOF. Position/title name tags are not available at work locations in the EOF. The county map in the EOF dose assessment area is not labeled to include sector nomenclature. (Section 4c) (50-315/82-18-06; 50-316/82-18-06)
- The container used to transport a primary reactor coolant sample is inadequately shielded. (Section 4e) (50-315/82-18-07; 50-316/82-18-07)
- Prior to sampling, no radiation exposure assessment of the primary coolant sample was provided to the sampling team. (Section 4e) (50-315/82-18-08; 50-316/82-18-08)
- 9. Procedure PMP 2081 EPP.012 does not provide for plume mapping in the vicinity of established survey points. Due to the numerous variations in terrain elevation within and near the property line, mapping techniques are necessary for obtaining measurements representative of the areas around these points. (Section 4f) (50-315/82-18-09; 50-316/82-18-09)
- 10. Inadequate plume monitoring techniques for air sampling were demonstrated during the exercise. Beta/gamma versus gamma measurements with a thin window detector were not made to ensure that representative air samples were taken of the plume atmosphere. (Section 4f) (50-315/82-18-10; 50-316/82-18-10)