

INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

July 2, 1982
AEP:NRC:0682A

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
ADDITIONAL RESPONSE IE REPORT NOS. 50-315/82-04; 50-316/82-04

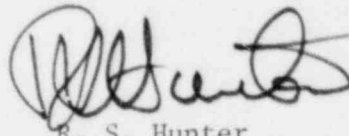
Mr. James G. Keppler, Regional Administrator
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

The Attachment to this letter provides our response to Mr. R. L. Spessard's letter of May 28, 1982.

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,



R. S. Hunter
Vice President

/os

cc: John E. Dolan - Columbus
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
NRC Resident Inspector at Cook Plant - Bridgman

IE INSPECTION REPORT 315/82-04; 316/82-04
SUPPLEMENTAL RESPONSE

In response to Mr. Spessard's May 28, 1982, letter the plant's policy on Design Change control has been discussed at the Plant Manager's Staff Meetings. This policy requires that equipment and systems not be utilized following the installation of Design Changes until all drawings affected by the Design Change are revised. These controls are stated in the Plant Manager's Design Change Instruction and were required at the time of the NRC Resident Inspector's evaluation of this program. Strict compliance with this requirement was stressed by the Plant Manager and any departure from these requirements must be approved by Senior Plant Management.

Our initial review subsequent to this inspection's finding revealed that the constraints imposed by the Plant Manager's Design Change Instruction were overly restrictive in some areas and had a tendency to detain implementation of the established controls. Our review of these controls is continuing and we will be responsive to this concern in the forthcoming revision of PMI-5040.

As an interim measure, a temporary change was implemented to the Design Change Instruction on March 25, 1982, which is more responsive to the drawing revision process. This amended approach isolates the more critical groups of drawings necessary for Plant operation (example given, elementaries, one-lines, and flow diagrams) from the remaining drawings and insures that these drawings are revised in an expedited manner following the installation of the Design Change.

In addition to this measure, pending issuance of the revised PMI-5040, the Operations Department is reviewing all RFCs being installed to determine if any drawings are required to be revised prior to returning the system modified by the Design Change to operation.

In parallel with this measure, we have performed the following:

- a) A draft revision to the Plant Manager's Design Change Instruction was prepared and issued for comment.
- b) Meetings were held to discuss the proposed draft, and a second draft based on comments received at these meetings has recently been compiled and will be distributed to all concerned parties shortly.

Our review of this subject and issuance of a revised instruction will be completed prior to startup from the schedule 1982 refueling outage for Unit No. 1. Having the revised instruction implemented prior to the end of the forthcoming refueling outage, will insure that the Design Changes performed during this outage are closed out in accordance with the controls established within the revised Design Change Instruction (PMI-5040).