

DmB

SEP 8 1983

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 and Construction
1 Riverside Plaza
Columbus, OH 43216

Gentlemen:

This refers to the routine safety inspection conducted by Messrs. M. Phillips and R. Lickus of this office on July 5-8, 1983, of activities at the D. C. Cook Nuclear Power Plant authorized by NRC Operating License Nos. DPR-58 and DPR-74 and to the discussion of our findings with Mr. W. G. Smith, Jr., 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, interviews with personnel, and a review of the letter from Mr. R. S. Hunter to Mr. James G. Keppler dated August 12, 1982.

No items of noncompliance with NRC requirements were identified during the course of this inspection.

In addition to the above inspection, we have completed our review of your revised Donald C. Cook Nuclear Plant Emergency Plan dated August 13, 1982, and supplemented by various correspondence from your office, the latest of which was submitted on July 29, 1983. These are identified in Section 2.b of the enclosed report. The Safety Evaluation Report contains the NRC Staff's conclusions. Additional clarification regarding the items described in the enclosed appendix is necessary to allow us to close out Sections E, H, J, N, and P of the Safety Evaluation Report.

Accordingly, please submit a written statement to this office within forty-five days of the date of this letter describing your planned actions for clarifying the items identified in the Appendix.

Please be reminded that 10 CFR 50.54(q) requires that changes to your emergency plan may be made without Commission approval only if such changes do not decrease the effectiveness of the plan, and the plan as changed continues to meet the standards of 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. In all cases, you should furnish copies of each proposed change to the NRC in accordance with 10 CFR 50.54(q).

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Any changes to the Emergency Plan implementing Procedures should be made pursuant to the requirements of 10 CFR Part 50, Appendix E, Section V (Implementing Procedures).

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit a written application to withhold such information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). If we do not hear from you in this regard within the specified periods noted above, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room.

The response directed by this letter is 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,

C. J. Paperiello
C. J. Paperiello, Chief
Emergency Preparedness and
Radiological Safety Branch

Enclosures:

1. Appendix, Emergency Plan
Clarification Areas
2. Inspection Reports
No. 50-315/83-09(DRMSP) and
No. 50-316/83-10(DRMSP)

cc w/encs:

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
F. Pagano, Jr., EPLB, GIE
D. Wigginton, PM, ORB#1, NRR
D. Bement, FEMA, Region V

RIII

Phlips/db
08/19/83

RIII

Lickus

RIII

Snell

RIII

Boyd
9/8/83

RIII

Paperiello
9/8/83

APPENDIX

EMERGENCY PLAN CLARIFICATION AREAS

Based on ONE review of the Indiana and Michigan Electric Company Donald C. Cook Nuclear Plant Emergency Plan and supplemental correspondence, we conclude that upon satisfactory clarification of the items listed below, the licensee's emergency plan will meet the requirements of 10 CFR Part 50, Appendix E, and the planning standards of 10 CFR 50.47(b). The required clarifications are summarized as follows:

1. Clarify Section 12.3.6.1.3 of the plan to clearly indicate that offsite notifications occur for any emergency declaration rather than just those that may affect offsite individuals. (Planning Standard E)
2. Clarify Section 12.3.6.2 as to when offshift augmentation will occur, e.g., although TSC and OSA are activated for any Alert or higher emergency classification, the plan does not clearly indicate that shift augmentation (as required) will occur to staff these centers. (Planning Standard E)
3. Clarify when the TSC and OSA are activated. Part of the plan acceptably states that these centers are activated for an Alert or higher emergency, but another part of the plan indicates that it is activated for a Site or General Emergency or for a required Alert. Since all Alerts would require its activation, but not necessarily with the full TSC and OSA staffs, this should be clarified in the plan. (Planning Standard H)
4. Clarify the meteorological measurements program by providing sufficient detail to indicate that it is capable of providing reliable indication of representative meteorological conditions up to ten miles from the plant site. (Planning Standard H)
5. Clarify the referenced evacuation time estimates to incorporate the use of the prompt public notification system. Appendix E to 10 CFR Part 50 requires the design of this system to essentially complete notification of all individuals in the EPZ within fifteen minutes, yet the evacuation time estimates indicate the notification times range from twenty minutes to six hours. In addition, these estimates should provide sufficient information to determine whether they meet the guidance provided in Appendix 4 of NUREG-0654, Revision 1. (Planning Standard J)
6. Clarify the protective action recommendation making process, specifically including the basis for choice between alternate protective action recommendations such as sheltering or evacuation, identifying the source of the values listed in the protective action guide section, and describing how protective action recommendations will be made for potential releases (such as that outlined in Attachment 2 to the enclosed inspection report). (Planning Standard J)

7. Clarify how scenarios will be varied to test all elements of the plan during a five year period (for example, the offshift augmentation aspect of the plan can only be tested during an off-hours exercise). (Planning Standard N)
8. Clarify the frequency for use of the post-accident sampling system and the inclusion of environs sampling and analysis of sample media such as soil, air, water, and grass in the Health Physics Drills described in Section 12.3.15.1.10 of the plan. (Planning Standard N)
9. Clarify in Section 12.3.15.1.9 of the plan how the capability to notify the NRC Operations Centers (Bethesda and Region III) from the control room, TSC, and EOF are tested. This is required on a monthly basis. (Planning Standard N)
10. Clarify the frequency for determining that telephone numbers listed in emergency procedures are correct. (Planning Standard P)