

INDIANA & MICHIGAN ELECTRIC COMPANY

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June 27, 1984
AEP:NRC:0867

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Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
INDIVIDUALS' EXPOSURE REPORTS

Mr. James G. Keppler, Regional Administrator
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

10 CFR 20.408(b) and 10 CFR 20.409(b) provide the licensee requirements regarding the timely provision of worker radiation exposure information to the NRC and the worker. The reporting requirements apply to terminated employees, and to individuals assigned to work in a licensee's facility but who are not employees of the licensee and have completed their work at the licensee's facility.

American Electric Power Service Corporation is the corporate support organization for the D. C. Cook Plant and is a wholly owned subsidiary of American Electric Power Company, Inc., which owns all of the common stock of Indiana & Michigan Electric Company (the licensee for the D. C. Cook Nuclear Plant). In the performance of their duties, numerous AEPSC personnel travel to the Plant on a frequent, irregular basis.

The current practice at the Cook Nuclear Plant is to consider AEPSC personnel as non-licensee employees with respect to the above regulations. This practice significantly increases the complexity (and quantity of paperwork) associated with tracking the on-site presence, departure date, return to site date, or "no return to site within 90 days of last departure" for AEPSC personnel. A report of the individual's radiation exposure is generated in accordance with the cited regulations if an AEPSC individual does not return to the Plant within 90 days of last departure. If the AEPSC individual returns to the site within 90 days of last departure, then the "90-day clock" is started again upon completion of the trip.

Clearly, the above practice is a conservative program but in our opinion is not the intent of 10 CFR 20.408(b) and 10 CFR 20.409(b). Therefore, we request your concurrence with our intention to treat AEPSC employees, as members of a common corporate organization, the same as licensee employees. Your concurrence would relieve us of a complex and unnecessary burden on the Plant administrative staff.

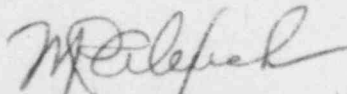
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We would like to place this program into effect on July 15, 1984. Your comments, concurrence with this interpretation, or additional guidance in this matter is requested in support of this schedule.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,



M. P. Alexich
Vice President

Ken
6-27-84

th

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
E. R. Swanson, NRC Resident Inspector .. Bridgman