

Appendix

NOTICE OF VIOLATION

American Electric Power Service
Corporation
D. C. Cook Nuclear Power Plant

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

As a result of the inspection conducted on January 7-11, 1985, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. Technical Specification 6.8.2 states, in part, that procedures are to be "reviewed periodically as set forth in the administrative procedures." Procedure PMI-2010, Revision 10, states that "all effective instructions and procedures shall be reviewed biennially".

Contrary to the above, procedure PMI-2070, Revision 6, dated September 5, 1979, has not been reviewed on a biennial schedule.

This is a Severity Level V violation (Supplement VIII).

2. 10 CFR 50.54(q) requires, in part, that a licensee authorized to operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) of this part and the requirements in Appendix E to this part. 10 CFR Part 50, Appendix E, Section IV.F states, in part, that the program to provide for training of employees shall include a description of specialized initial training and periodic retraining programs to be provided to each of the following categories of emergency personnel: a. Directors and/or coordinators of the plant emergency organization; and b. Personnel responsible for accident assessment, including control room shift personnel. Section 12.3.15.1.2 of the Donald C. Cook Nuclear Plant Emergency Plan states, in part, that specialized initial training and retraining for personnel responsible for accident assessment is provided.

Contrary to the above, no specialized initial training or periodic retraining is or has been provided to personnel who are assigned to key radiation protection and assessment positions.

This is a Severity Level IV violation (Supplement VIII).

3. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). Section IV.B of Appendix E requires that a licensee's emergency plans shall include information to demonstrate compliance with the following:

8503060026 850211
PDR ADOCK 05000315
Q PDR

The means for determining the magnitude and for continually assessing the impact of the release of radioactive material shall be described, including emergency action levels that are to be used as criteria for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety.

Section 12.3.3.2.2 of the D. C. Cook Nuclear Plant Emergency Plan states in part that the Plant Manager is designated the Onsite Emergency Coordinator, and that upon initiation of the Emergency Plan, the Plant Manager will assume full responsibility for recommending offsite emergency actions to the State and County response agencies. Section 12.3.3.1 of the Emergency Plan states in part that the Shift Supervisor is the individual responsible for the emergency response functions until relieved by the Plant Manager.

Contrary to the above, individuals designated to fill emergency roles can not function as required in that the majority of the Shift Supervisors who have the initial responsibility and authority of the Onsite Emergency Coordinator to make offsite protective action recommendations, were incapable during this inspection of determining when and what type of protective measures should be considered outside the site boundary to protect public health and safety.

This is a Severity Level IV violation (Supplement VIII).

4. 10 CFR Part 50, Appendix E, Section IV.B states in part that licensee's are required to have emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies... 10 CFR Part 50, Appendix E, Section IV.C states in part that the emergency classes defined shall include: (1) notification of unusual event, (2) alert, (3) site area emergency, and (4) general emergency. 10 CFR Part 50, Appendix E, IV.D.3 states in part that a licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency.

Contrary to the above, on April 4, 1984, after a loss of both emergency diesels for Unit 2, a notification of unusual event was not declared until 37 minutes after the declaration of an unusual event was required based on this event, the required notifications to offsite authorities were not completed until 54 minutes after the initiation of the event.

This is a Severity Level IV violation (Supplement VIII).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Feb. 11, 1985
Dated

J. A. Hind
J. A. Hind, Director
Division of Radiation Safety
and Safeguards