

A unit of American Electric Power

Indiana Michigan Power One Cook Place Bridgman, MI 49106 IndianaMichiganPower.com

June 8, 2012

AEP NRC 2012-43 10 CFR 50.54(f)

Docket No.: 50-315

50-316

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk

11555 Rockville Pike Rockville. MD 20852

Donald C. Cook Nuclear Plant Units 1 and 2

Emergency Preparedness Information Requested by Nuclear Regulatory Commission Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012.

References:

- Letter from E. J. Leeds and M. R. Johnson, Nuclear Regulatory Commission (NRC), to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred Status, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012, (ML12056A046).
- Letter from J. P. Gebbie, Indiana Michigan Power (I&M), to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, 60-Day Response to NRC Letter, Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident, dated March 12, 2012," dated May 11, 2012, (AEP NRC 2012-34).

On March 12, 2012, the NRC issued Reference 1 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also provided requested due dates for written responses.

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U. S. Nuclear Regulatory Commission Page 2

Per Reference 2, I&M, licensee for the Donald C. Cook Nuclear Plant Units 1 and 2, submitted an alternative course of action for providing the requested information. The alternative course of action included revised due dates and the basis for those dates. As described in our alternative course of action, this letter transmits to you the responses to the following information requests.

- Reference 1, Communications, Information Request #2
- Reference 1, Staffing, Information Request #3
- Reference 1, Staffing, Information Request #4
- Reference 1, Staffing, Information Request #5

Enclosure 1 provides an affirmation. The response to requested information is provided as Enclosure 2. New regulatory commitments are summarized in Enclosure 3. Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,

Joel P. Gebbie

Site Vice President

pulp-Kelli

MCS/kmh

Enclosures:

- Affirmation
- 2. Response to Information Requested
- 3. Regulatory Commitments

c: C. A. Casto, NRC Region III
J. T. King, MPSC
S. M. Krawec, AEP Ft. Wayne, w/o enclosure
MDEQ – RMD/RPS
NRC Resident Inspector
P. S. Tam, NRC Washington DC

ENCLOSURE 1 TO AEP NRC 2012-43

AFFIRMATION

I, Joel P. Gebbie, being duly sworn, state that I am Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company

Joel	P. G	ebbie
Site	Vice	President

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SWORN TO AND SUBSCRIBED BEFORE ME

THIS 8th DAY OF June, 2012
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My Commission Expires 1-21-18

ENCLOSURE 2 TO AEP NRC 2012-43

RESPONSE TO INFORMATION REQUESTED

Reference:

Letter from J. P. Gebbie, Indiana Michigan Power (I&M), to NRC Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, 60-Day Response to NRC Letter, Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident, dated March 12, 2012," dated May 11, 2012, (AEP NRC 2012-34).

This enclosure provides Indiana Michigan Power's (I&M) response for the Donald C. Cook Nuclear Plant Units 1 and 2 (CNP) Communications Request #2 and Staffing Requests #3, 4, and 5, from Enclosure 5 of the reference letter.

Nuclear Regulatory Commission (NRC) Requested Information: Communication Question #2

Addressees are requested to describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

I&M Response: Communication Question #2

Actions Taken or Planned:

Actions Taken		
Actions	Status	
Conduct a load shedding analysis of the existing systems power supplies.	Complete	
Order additional backup power sources.	Complete	
 Purchase the following communications equipment: 18 synchronous battery powered satellite phone command center and responder packages. 153 additional batteries for handheld radios. 17 additional bank chargers for handheld radio batteries. 	Complete	

I&M conducted an analysis for load shedding which identified the need to purchase additional backup power sources to support communications equipment. Additional batteries, battery chargers, and generators were purchased.

I&M conducted an analysis of existing communications systems/equipment which identified the need to purchase additional communications equipment. Eighteen synchronous battery powered satellite phone command center and responder packages have been purchased to be pre-staged as follows:

- One (1) in each Control Room (one (1) of which may be used by the Work Control Center Senior Reactor Operator)
- Four (4) for Security (Central Alarm Station, Secondary Alarm Station, and two (2) mobile)
- One (1) for the Technical Support Center
- Two (2) for Onsite Survey Teams
- Three (3) for the Emergency Operations Facility (State Communicator, Incident Command Post, and Field Team Communicator)
- Two (2) for Offsite Survey Teams/Vehicles
- Four (4) for Offsite Response Organizations.

Actions Planned		
Actions	Completion Date	
Provide satellite phone training to personnel required to use the primary and backup Emergency Response Organization (ERO) communications.	July 31, 2012	
Provide training to personnel required to use the procedures associated with primary and backup ERO communications.	July 31, 2012	
Enhance procedures to address powering primary and backup communications.	September 26, 2012	
Perform a drill demonstrating strategy / procedures for insuring power beyond 24 hours to communications equipment.	September 26, 2012	

NRC Requested Information: Staffing Question #3

Identify how the augmented staff would be notified given degraded communications capabilities.

I&M Response: Staffing Question #3

Method	Description
Automatic Response	I&M will train and incorporate expectations set for ERO members to automatically respond to a designated staging area when made aware of an area-wide disaster (e.g., loss-of-grid, natural or man-made disaster, etc.) resulting in degraded communications capabilities, into the TS-C-CS17 (E-Plan Overview) and NANTeL EP-C-ANRQ (Emergency Plan Annual Requal) lesson plans. Completion Date: June 29, 2012

NRC Requested Information: Staffing Question #4

Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

I&M Response: Staffing Question #4

The following methods of access to the site are available. After a widespread large scale natural event, an assessment will be made to determine which methods of access are available to expeditiously transport personnel to the site.

Method	Description
Roadway	The preferred route to access the site is westbound along the paved main site access road. If the westbound route is impassable or unsafe, access to the site is available northbound along the Lake Michigan Beach.
Air	CNP has a designated onsite landing zone for helicopter access for emergency transport of personnel.

NRC Requested Information: Staffing Question #5

Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

I&M Response: Staffing Question #5

Actions Taken or Planned:

Actions Taken		
	Action	Completion Date
None		N/A

Actions Planned		
Actions	Completion Date	
I&M will train and incorporate expectations set for ERO members to automatically respond to their assigned facilities or a designated staging area when made aware of an area-wide disaster (e.g. loss-of-grid, natural or man-made disaster, etc.) resulting in degraded communications capabilities, into the TS-C-CS17 (E-Plan Overview) and NANTeL EP-C-ANRQ (Emergency Plan Annual Requal.) lesson plans.	June 29, 2012	

ENCLOSURE 3 TO AEP NRC 2012-43

REGULATORY COMMITMENTS

The following table identifies those actions committed to by Indiana Michigan Power Company (I&M) in this document. Any other actions described in this submittal represent intended or planned actions by I&M. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

Commitment	Date
Incorporate expectations set for the Emergency Response Organization (ERO) to automatically respond to or a designated staging area when made aware of an area-wide disaster (e.g. loss-of-grid, natural or man-made disaster, etc.) resulting in degraded communications capabilities, into the TS-C-CS17 (E-Plan Overview) and NANTeL EP-C-ANRQ (Emergency Plan Annual Requal) lesson plans.	June 29, 2012
I&M will train and incorporate expectations set for ERO members to automatically respond to a designated staging area when made aware of an area-wide disaster resulting in degraded communications capabilities, into the TS-C-CS17 (E-Plan Overview) and NANTeL EP-C-ANRQ (Emergency Plan Annual Requal) lesson plans.	June 29, 2012
Provide satellite phone training to personnel required to use the primary and backup ERO communications.	July 31, 2012
Provide training to personnel required to use the procedures associated with primary and backup ERO communications.	July 31, 2012
Enhance procedures to address powering primary and backup communications.	September 26, 2012
Perform a drill demonstrating strategy / procedures for insuring power beyond 24 hours to communications equipment.	September 26, 2012