



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

August 13, 2015

Mr. Larry Weber
Senior Vice President and
Chief Nuclear Officer
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

SUBJECT: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM
IDENTIFICATION AND RESOLUTION INSPECTION AT D.C. COOK,
UNITS 1 AND 2

Dear Mr. Weber:

This letter is to request information to support our biennial Problem Identification and Resolution (PI&R) inspection beginning September 14, 2015, at D. C. Cook, Units 1 and 2. This inspection will be performed in accordance with the U.S. Nuclear Regulatory Commission (NRC) Baseline Inspection Procedure 71152.

Experience has shown that these inspections are extremely resource intensive both for the NRC inspectors and the utility staff. In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a list of documents required for the inspection.

The documents requested are copies of condition reports and lists of information necessary to ensure the inspection team is adequately prepared for the inspection. This information request may be provided in either electronic or hard copy format and should be ready for NRC review by September 7, 2015. Mr. Bruce Bartlett, the Lead Inspector, will contact your staff to determine the best method of providing the requested information.

If there are any questions about the material requested, or the inspection in general, please do not hesitate to call or e-mail Mr. Bruce Bartlett at 630-829-9753 or bruce.bartlett@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011.

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number.

L. Weber

-2-

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Kenneth Riemer, Chief
Branch 2
Division of Reactor Projects

Docket Nos. 50-315; 50-316
License Nos. DPR-58; DPR-74

Enclosure:
Requested Information to Support
Problem Identification and Resolution
Inspection: IR 05000315-2015007;
05000316-2015007

cc w/encl: Distribution via LISTSERV®

**REQUESTED INFORMATION TO SUPPORT
PROBLEM IDENTIFICATION AND RESOLUTION
INSPECTION REPORT 05000315-05000316/2015007**

Please provide the information on a compact disc or another form of electronic media, if possible. Unless otherwise specified, the time frame for requested information is for the period of September 1, 2013, through the time the data request is answered. For requested lists please provide the information, if possible, in a "sortable" Excel spreadsheet format.

In addition, the inspectors will require computer access to the corrective action program (CAP) database while on site.

PROGRAM DOCUMENTS:

1. A current copy of administrative procedure(s) for the CAP, quality assurance audit program, self-assessment program, corrective action effectiveness review program, trending program, industry experience review program, and top-level documents for the work control programs, work scheduling programs, and aging management program(s).
2. A current copy of the Employee Concerns Program/Ombudsman administrative procedure(s).
3. Description of any substantive changes made to the corrective action program since the last Problem Identification and Resolution (PI&R) Inspection. Please include with each listed change the effective date of the change.

ASSESSMENTS:

4. A copy of Quality Assurance (QA) audits of the CAP and, if done, audits of the QA program.
5. A list of all other QA audits completed with a brief description of areas where findings requiring corrective action were identified.
6. The plan for future self-assessments of the CAP and QA program and a copy of your schedule for future assessments, out to no more than two years.
7. A copy of completed assessments of the CAP program, the QA program, and the self-assessment program.
8. A list of all other self-assessments completed with a brief description. Indicate which assessments resulted in CRs for adverse findings.
9. A list of issue reports (IRs)/condition reports (CRs) written for findings or concerns identified in self-assessments and audits that required follow-up action. Include a short description of the finding, its status, and include a cross-reference to the audit or self-assessment number.

Enclosure

CORRECTIVE ACTION DOCUMENTS:

10. A list of completed root cause evaluations completed with a brief description of the issue. Provide status of any actions developed as part of the evaluations and a reference, if not part of the root cause package, to the documents and/or IRs/CRs directing and tracking the actions.
11. A list of completed apparent cause evaluations completed with a brief description of the issue. Provide status of any actions developed as part of the evaluations and a reference, if not part of the apparent cause package, to the documents and/or IRs/CRs directing and tracking the actions. Please identify if the apparent cause evaluations were full or limited evaluations.
12. A list of all open IRs/CRs sorted by significance level and then initiation date. Include the identification number, the date initiated, a brief description/title of the issue, system affected if any, significance level, priority level, assigned organization, and anticipated completion date, if available.
13. A list of IRs/CRs closed, sorted by significance level and then initiation date. Include the identification number, a brief description/title, the significance level, the priority level, the date initiated and closed, assigned organization, system affected, cause codes assigned, and whether there was an associated operability evaluation.
14. A list of condition reports generated by the corporate office that involve or affect site operation, sorted by significance level. Include the date initiated, a brief description/title of the issue, other site(s) affected, system affected, significance level, status, assigned organization, and closure date or anticipated completion date, if available.
15. A list of completed effectiveness reviews of IRs/CRs with developed remedial and corrective actions along with a brief description of the results of those reviews. Include a cross-reference to the IRs/CRs for which the effectiveness review was conducted and, if applicable, IR/CR numbers documenting any additional follow-up actions.
16. A list of IRs/CRs initiated for identified inadequate or ineffective corrective or those that needed remedial actions. Include the date initiated, a brief description, status, significance level of the issue, system affected, assigned organization, priority level to correct, completion/closure date or, if applicable, anticipated completion date, if available. Include a cross-reference to the IRs/CRs, or evaluation that generated the original corrective action.
17. A copy of any performance reports or indicators used to track the corrective action program effectiveness. The most recent data and end-of-year and middle-of-year data.
18. A list of IRs/CRs issued during the last refueling outage on each unit sorted by system and component, including a brief description, status, significance level, priority level for each item, identifying and assigned organization(s), and actual or anticipated closure date.

TRENDS:

19. A list of initiated IRs/CRs that identify trends of conditions adverse to quality. Include the date initiated, a brief description, significance level, priority level for each item, and date closed or anticipated closure date.
20. Copies of any completed trend reports that are associated with overall CAP performance and/or effectiveness.

OPERATING EXPERIENCE:

21. A copy of the most recent operating experience program effectiveness review and/or assessment.
22. A list of operating experience documents reviewed (after initial preliminary screening) and any associated condition reports. Please provide identification of the originating organization, the initiating organization's document/reference number, your identification number if different than the originators, a brief description/title of the issue, and status of the review and any developed follow-up actions. Indicate the initiation date and the closure date or the anticipated closure date if available.

SYSTEMS AND COMPONENTS:

23. A list of the top ten risk significant systems and top ten risk significant components.
24. A list of operability determinations/evaluations. Include a brief description/title of the issue, date initiated, date closed or date anticipated to be closed. Include any operability evaluations that are still open and that were initiated prior to September 1, 2013.
25. A listing of cause analysis, corrective action documents, and trend analysis for systems and components considered Maintenance Rule (a)(1) at any time since September 1, 2013. Provide copies of the applicable system health report sections and maintenance rule action plans for those systems starting one year earlier from when the system or component entered (a)(1) status. Include dates when system/components entered (a)(1) status and, if applicable, returned to (a)(2) status. For recurring reports, the most recent and middle-of-year and end-of-year reports are sufficient; monthly reports are not required.
26. A list of test failures (IST or Technical Specifications surveillances) with a brief description of component/system failed. Indicate if the failure was a maintenance preventable failure. Please include any failures of test equipment calibrations that necessitated a review of past surveillances and/or tests.
27. A list of temporary modifications with a brief description of the modification, installation date, and date closed or anticipated closure date. Include any open temporary modifications that were installed prior to September 1, 2013.
28. A list of rework items and repeat failures. Include cross-references to applicable Work Orders (WOs) and IRs/CRs.

29. A list of plant trips, downpowers (greater than 20 percent), limiting condition for operation (LCO) entries (not scheduled), and licensee event reports (LERs), including dates of these events.
30. A list of open WOs/equipment work requests with a brief description. Identify the work order as outage or non-outage, the date of initiation and scheduled or anticipated closure date, if available. Also provide the classification of the WOs with the recent industry classification scheme. Provide an explanation of the classification scheme and the procedure governing the classification. Work requests/WOs not associated with a degraded equipment condition (e.g. WOs for voluntary plant upgrades, preventive maintenance) do not have to be included in the list.
31. A copy of any trend reports for WOs. The most recent trend reports and those that existed at the end-of-year and middle-of-year are acceptable; copies of monthly reports are not required. Include a copy of a recent (within two months of the data submittal) graph or document showing the status of work week planning of work activities.

SCWE:

32. Copy of the results of safety culture and/or safety conscious work environment (SCWE) surveys or self-assessments completed since September 1, 2013. Include any organizational effectiveness surveys conducted by internal or external organizations. Include a listing of any action(s) resulting from the survey(s) and the status of the action(s).
33. SCWE issues identified through alternate avenues, such as the employee concerns programs. If issue(s) are considered sensitive, in lieu of describing issue in the data package, provide a paper copy to the lead inspector at the start of the inspection.

REGULATORY ISSUES:

34. Copies of all apparent, common and/or root cause evaluations initiated to address identified adverse human performance trends or safety culture adverse trends.
35. Copies of IRs/CRs, investigations, and corrective actions taken for issues identified in NRC findings since September 1, 2013. Identify the status of the corrective actions and any effectiveness reviews completed or scheduled. Include a copy of effectiveness reviews that were done.

ADMIN:

36. A copy of the latest organizational chart and phone listing.
37. A list of the dates, times, and location for all scheduled meetings associated with the implementation of the CAP. Include any work order screening meetings.

5-YEAR REVIEW:

38. An excel sortable list of condition reports associated with your Essential Service Water System (ESWS) going back to September 1, 2010. Please indicate in the list the status of the IR/CR (e.g. open, closed, working, etc.), initiation date, closure date, number of developed corrective actions and indication if any remain open, the classification/priority, and a descriptive title of the CR.
39. A copy of site performance indicators (PIs), if any, associated with essential service water (ESW) going back to June 1, 2010. Only need to provide a copy of recurring PIs for every 6 months (i.e. end of year and middle of year documents for 2014, 2013, etc.). Also include a copy of the latest PI data.
40. A copy of the System Health report sections, or equivalent documents, for ESW for each year starting in September 2010 until the current date.
41. A copy of any Maintenance Rule Action plans (a)(1) action plans with completion status for ESW that were developed since September 1, 2010.

DOCUMENTS REQUESTED TO BE AVAILABLE ON-SITE DURING THE INSPECTION IN EITHER PAPER OR ELECTRONIC, WITH SEARCH CAPABILITY, (PREFERRED) FORMAT:

- a. Updated Final Safety Analysis Report;
- b. Technical Specifications;
- c. Procedures and procedure index;
- d. Copies of any self-assessments and associated IRs/CRs generated in preparation for the inspection;
- e. A copy of the QA manual;
- f. A list of issues brought to the Employee Concerns Program (ECP)/ombudsman and the actions taken for resolution;
- g. A list of the codes used in the CAP and WOs system(s);
- h. A copy of the most recent monthly performance indicator document and the system health report or the equivalent documents and a copy of the equivalent documents from the end of 2014 and 2013; and
- i. A copy of the latest independent/offsite organization review of safety culture/safety conscious work environment and organizational effectiveness and internal equivalent assessments if not provided as part of the requested data package.

OTHER:

On the first day of the inspection, or early on the second day, please provide the inspection team a briefing of your CAP including an overview of your actions, if any, associated with recent industry efforts to improve the efficiency of the CAP. Include your expectations for personnel using the program and how the work order system fits into the overall scheme for addressing identified issues. Also please demonstrate how to use a computer to access CAP data.

L. Weber

-2-

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Kenneth Riemer, Chief
Branch 2
Division of Reactor Projects

Docket Nos. 50-315; 50-316
License Nos. DPR-58; DPR-74

Enclosure:
Requested Information to Support
Problem Identification and Resolution
Inspection: IR 05000315-2015007;
05000316-2015007

cc w/encl: Distribution via LISTSERV®

DISTRIBUTION w/encl:

Kimyata MorganButler
RidsNrrDorLpl3-1 Resource
RidsNrrPMDCCook Resource
RidsNrrDirslrib Resource
Cynthia Pederson
Darrell Roberts
Richard Skokowski

Allan Barker
Carole Ariano
Linda Linn
DRPIII
DRSIII
Jim Clay
Carmen Olteanu
ROPreports.Resource@nrc.gov

ADAMS Accession Number: ML15225A577

☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

To receive a copy of this document, indicate in the concurrence box "C" = Copy without attach/encl "E" = Copy with attach/encl "N" = No copy

OFFICE	RIII		RIII		RIII		RIII	
NAME	BBartlett.mc		KRiemer					
DATE	8/13/2015		8/13/2015					

OFFICIAL RECORD COPY