

INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

January 25, 1982
AEP:NRC:0625A

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE INSPECTION REPORTS 50-315/81-20; 50-316/81-23 AND
50-315/81-27; 50-316/81-31

Mr. James G. Keppler, Director
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

At the November 2, 1981 meeting between NRC Region III and Indiana & Michigan Electric Company, we presented you with an update on the management activities concerning the operation of Donald C. Cook Nuclear Plant, and a status report on the corrective actions which we have already initiated as summarized in our October 16, 1981 letter. You informed us at the meeting that you could conclude from our presentations that we have made significant progress in a number of areas since we last met with you at the August 4 Enforcement Conference. You asked us to supplement our October 16 letter to update the status of our activities, the scope of the contemplated corrective actions and a schedule for their completion. This letter is the response to your request.

Listed below is an update on the specific actions which we have already initiated as listed in our October 16, 1981 letter. The numbers below correspond to the numbers used in our October 16, 1981 letter.

1. The AEP nuclear operations and engineering corporate policy was issued on October 27, 1981 by the AEP Chairman of the Board. It states that our objective is to achieve a rating of "above average", the highest on the scale of nuclear plant measurement, as

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assessed by the Nuclear Regulatory Commission. It includes the following policy statements: (1) employing and maintaining a highly professional engineering organization to support the design and operation of the Plant, (2) using the experience of other nuclear utilities, the NRC, and the Institute of Nuclear Power Operations, (3) employing and maintaining a highly trained and motivated operating and maintenance staff at the Plant and providing them with effective procedures and instructions that are formulated by the collective efforts of our operating and engineering personnel, (4) strictly adhering to both the letter and the spirit of the Plant's operating licenses, (5) maintaining on a high priority a dynamic industrial safety program, and (6) establishing a formal ALARA (As Low As Reasonably Achievable) radiation exposure program. This corporate policy statement is only the first step. The management at the AEPSC Engineering Office will issue its own underlying policy statement which sets more specific guidance for the nuclear operations and support activities by February 15, 1982. This policy statement will include all significant operating and technical support roles. Then, policy statements will be written by the managements of the organizational groups in AEPSC-New York and at the Plant for activities for which they are responsible. We plan to have the implementing policy statements issued by April 1, 1982. Our goal is to work together to achieve not only the best regulatory performance, but to operate and support Cook Plant so as to maximize its operating safety, efficiency, reliability, and economy of operations.

2. We are reviewing the position descriptions for Plant and AEPSC engineering support personnel to insure they accurately describe to the people their responsibilities and provide a meaningful yardstick for managers to use in evaluating performance. Several position descriptions for Plant personnel have already been reviewed and updated at the Plant to get an idea of the magnitude of this job. Currently we are working with our Personnel Department in Fort Wayne to get assistance in reviewing and re-writing position descriptions. A target date of July 1, 1982 has been set to complete this work. The position descriptions for AEPSC engineering personnel who support the Cook Plant operation are under review in AEPSC with an objective of reviewing and revising, where necessary, all applicable position descriptions by April 1, 1982. The AEPSC Personnel Department policy on preparation of position descriptions is being used as the guidelines for this review; the position descriptions are being supplemented, as necessary, to reflect the person's specific Cook Plant activities.

3. The Fire Protection Coordinator started work at the Plant on October 19, 1981.
4. Guidelines for telephone communications from the AEPSC-New York Office to the Cook Plant were issued on October 19, 1981. These guidelines are for controlling redundant and uncoordinated requests for information by AEPSC engineers. The communications from the Plant to AEPSC remains free so that there are no impediments to quickly responding to the Plant Staff's requests for assistance or information.
5. In order to expand our Operations Department to five shifts and perhaps a sixth shift, a special program has been undertaken and is expected to be completed by around February, 1983. The program involves the hiring and training of additional people as reactor operators. The goal of this program is to reduce the turnover rate of Operations personnel and, in time, minimize the need for overtime for training purposes.
6. In order to review and revise the Operations Department procedures by January 1, 1982, a special task force was assembled at the Plant. This team consists of three SRO's, two Operations Department Engineers, two Quality Control Implementation Coordinators, two typists and support from the Plant Quality Assurance Department. In addition, AEPSC cognizant engineers and quality assurance engineers from the New York Office are coming to the Plant site to assist in this project. As a result of this effort, there are ten to fifteen people working daily on this project. In order to speed this project along, and to enhance rapid, future changes, special word processing equipment has been obtained. All the normal operating procedures and surveillance test procedures were reviewed by the Operations Department by January 1, 1982, and approximately 70% of these procedures were completely typed and approved by the end of 1981. In addition to the Operations Department operating and surveillance procedures discussed above, there are approximately seventy annunciator procedures which are being reviewed. This review involves a detailed engineering check of electrical elementary diagrams, electrical system descriptions, flow diagrams, protective limits and settings documents, technical specifications, as well as several other design documents. This effort has been underway in AEPSC Engineering Divisions since September 1981. The annunciator procedure reviews are projected to be completed by May 1, 1982. Following completion of the Operations Department procedures, we will undertake the appropriate review process for the Technical Department and Maintenance Department procedures.

7. A Plant policy has been established where minutes of exit interviews conducted by NRC inspectors are prepared. These meeting minutes are then transmitted to the resident inspector for his review and concurrence. Plant Management then reviews the minutes to establish and identify those items that need action and resolution by the Plant and also to identify the items that require AEPSC investigation. Copies of these minutes are transmitted to the New York Office. The minutes are reviewed by the Assistant Vice President-Nuclear Engineering and his two Assistant Division Managers. Assignments are made by the Plant Manager and by the Assistant Vice President-Nuclear Engineering to initiate corrective actions. We are taking a further step to ensure that there is a follow-through action on all commitments made to the NRC. The Plant Quality Assurance Organization is in the process of compiling a list of all commitments that have been made to the NRC in Licensee Event Reports, responses to Inspection and Enforcement Reports and NRC Bulletins. This effort is scheduled for completion by June 1, 1982.
8. The development of our computer based surveillance test scheduling system is continuing. As of January 1, 1982 all departments with the exception of the Operations Department have entered their data into the data base. The Operations Department plans to have their data entered by April, 1982. All of the remaining departments which have already entered their data into the data base are currently cross-checking the computer printouts against the manual methods which have traditionally been used for tracking surveillance schedules.

Several auxiliary subroutines which are used by the main controlling program have now been fully developed and tested. The purpose of these subroutines is to provide a means of thoroughly screening the input data for potential errors and they have been tested for a wide range of probable data which could be potentially used as input. Further, these subroutines make the whole system more reliable and easier to maintain. Versions of these subroutines are now available for testing by the users of the system. A user's manual will be drafted by the end of March, 1982. By early 1982 techniques for scheduling non-periodic surveillances will have been developed as well as other computer coding improvements which will enhance the system as a whole.

During preparation of the initial version of the data base of the required surveillances, the technical specifications were reviewed on a page by page basis for both Units and each "Surveillance Requirement" item was then entered into the data base and each item was then assigned to one of the departments at the Plant. Their responsibility was to then assign testing procedure numbers to each

item which then linked all surveillance requirements to Plant testing procedures thus closing the loop. This methodology has provided a check on all departments except the one mentioned above.

9. AEP's Human Engineering and Design Evaluation Organization reviewed the auxiliary building breaker labelling which was associated with the Unit 1 Licensee Event Report 81-05 wherein the safety injection valves on the wrong Unit were de-energized. As a result of that review twelve new labels (six on each Unit) were placed on the breakers on or about September 29, 1981. The labels are 10" x 14" rectangles with a 6" high Unit designator number with a 3" high valve number following. The color of the lettering is black on an orange background for Unit 1, and on a yellow background for Unit 2. We reported to you that this is a prototype installation for the Plant staff to evaluate the color scheme and effectiveness of the proposed solution before deciding upon the final Unit designation scheme for all Plant components. To date, we have decided that black on a blue background (instead of on a yellow background) is preferable for Unit 2. This evaluation is still on-going and is expected to include all Auxiliary Building and Turbine Building circuit breaker cabinets, valve labeling, room identification and labeling, the sealed valve program, and clearance permit tagging procedures. We are requesting samples and price quotes from vendors to find the most cost-effective labels for the breakers. The reason we have not yet completed this review is due to the priority being given by the Operations Department personnel on the operating procedures review (see Item 6 above). The same people are involved in the Unit designation evaluation. In addition, these same people are also assigned the responsibility to perform a human engineering review of the Control Rooms as required by NUREG-0700. At this writing, we are reviewing our approach to performing these evaluations, and we have not decided on the schedule for completing the Unit designation labeling.
10. The independent verification procedure has been modified on a trial basis for the Operations Department. Under this new procedure, independent verification is simultaneous by utilizing a two-person team to remove or return to service any technical specification equipment. One member of the team performs the work while the second member reads aloud the action required and verifies that the proper action has been taken. This procedure has been in effect since the end of October, 1981 and is working without any problems. Initial reaction by the Operators has been that this method is preferred over the old system. The main benefit of this procedure is that mistakes should be caught before they happen. The independent verification procedure applies to safety systems even when they are not required to function in the mode the Unit is in.

Mr. J. G. Keppler

AEP:NRC:0625A

11. My letter to you dated October 1, 1981 states that the Plant Manager's Instructions will be revised by the next refueling outage to designate a guard or other individual to be stationed at the 650' containment area to account for items going into and coming out of the refueling area (tools, instruments, clipboards, etc) during the time that the reactor vessel head is off the reactor vessel. This individual will also be responsible for checking persons going to this containment area to ensure that all items such as dosimeters, glasses, etc., are properly secured.
12. Proposals have been received from three companies to upgrade our radiation protection program to include a formal ALARA program at Cook Plant. These proposals are being evaluated by the Plant and AEPSC Engineering Staff. Their recommendations are expected by February 1, 1982.

Admiral Williams, with a small group, is leading an effort, the end objective of which is to insure that the filing and retrieval systems of the supporting engineering groups and the Plant are compatible.

Following is a summary of the findings of our management reviews, based on interviews conducted at the Plant.

Admiral Williams, Mr. W. W. Lowe, and Mr. S. J. Milioti are continuing the review we discussed in our October 16 letter. Areas being addressed include adequacy of the Plant organization from the standpoint of management control; under and over staffing; the relations and interaction of Corporate and Plant QA; improvement of communications between the Plant and NRC personnel; the functional interactions of Indiana & Michigan Electric Company, AEPSC engineering support and the Plant; utilization of the talent and training of the STAs; and centralized versus distributed training. The findings in these areas are more difficult to analyze, and developing and reviewing any further recommendations can be more time-consuming.

In closing two points should be noted. First, with respect to your concerns expressed at the November 2 meeting about the accuracy of information supplied to your office by licensees, please be assured that through our revised procedures for conducting detailed reviews of all NRC responses before they are sent to you, we will do our very best to provide you with thorough and accurate information. Second, although you have noted that there is a unique relation between the Plant and our corporate engineering office -- a relationship that you have not seen in other Region III licensees -- we strongly believe that our corporate structure and philosophy has advantages which have been repeatedly proven over the years in engineering, design and operating support activities. As part of our management reviews, we will examine our

Mr. J. G. Keppler

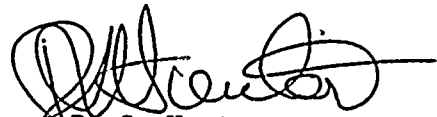
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organizational structure to make sure it is working effectively to address the types of events that formed the basis for the Enforcement Conference.

Please note that the dates given in this letter to complete certain actions are dates which we believe we can meet considering the manpower and work which we are currently aware of and barring unforeseen difficulties. Your NRC inspectors are welcome to review our progress in these activities. Should we not be able to meet any of these dates, we will inform you at our next meeting.

This supplemental report has attempted to demonstrate that we have an active program to address your comments and findings.

Very truly yours,



R. S. Hunter
Vice President

RSH/emc

cc: John E. Dolan - Columbus
R. W. Jurgensen
W. G. Smith - Bridgman
R. C. Callen
G. Charnoff
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9