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# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

February 23, 1984

AEP:NRC:0625F

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
Update Of The Regulatory Performance Improvement Program

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

PRINCIPAL STAFF			
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A/RA		DRMSP	has
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Dear Mr. Keppler:

Enclosed is a copy of the updated Regulatory Performance Improvement Program (RPIP). This update is divided into three appendices.

The first appendix describes our RPIP management organization.

The second appendix provides an update to activities which have been completed and have been incorporated into our normal practices. These activities were previously addressed in the following submittals:

- February 7, 1983 submittal AEP:NRC:0625C, which addressed the RPIP.
- July 15, 1983 submittal AEP:NRC:0625D, which addressed our response to NRC Inspection Report 50-315/83-01; 50-316/83-01 (Quality Assurance Activities).
- June 17, 1983 submittal AEP:NRC:0625E, which addressed the reorganization of our Quality Assurance/Quality Control program.

The third appendix addresses those RPIP activities which are ongoing. The scope of these activities has been defined and schedules have been provided for which the activities will be accomplished. We have also included our January 20, 1984 submittal (AEP:NRC:0858) as part of the scope of the activities addressed in this appendix. AEP:NRC:0858 addresses our response to the NRC Confirmatory Action Letter of November 17, 1983. AEP:NRC:0858 is not being resubmitted as part of this submittal.

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Mr. James G. Keppler

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AEP:NRC:0625F

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. P. Alexich", with a date "9/15" written to the right of the signature.

M. P. Alexich  
Vice President

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

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# **REGULATORY PERFORMANCE IMPROVEMENT PROGRAM**

## **APPENDIX A**

### **RPIP MANAGEMENT ORGANIZATION**

## **APPENDIX B**

### **COMPLETED RPIP ACTIVITIES**

**( UPDATE OF AEP:NRC:0625C,  
AEP:NRC:0625D, AND  
AEP:NRC:0625E )**

- 1) APPENDIX B PRESENTED IN AEP:NRC:0626C FORMAT.**
- 2) DESCRIPTION OF COMPLETED ACTIVITIES.**

## **APPENDIX C**

### **CURRENT RPIP ACTIVITIES ACTION PLAN**

# **APPENDIX A**

## **RPIP MANAGEMENT ORGANIZATION**

**W. S. WHITE**

**JOHN E. DOLAN**

**PROGRAM EFFECTIVENESS  
NSDRG**

**CORPORATE QA  
AUDITS/SURVEILLANCES**

**R. F. KROEGER  
T. P. BEILMAN**

**PROGRAM DEVELOPMENT  
MANAGER**

**P. A. BARRETT**

### **RESPONSIBILITIES**

- COORDINATING WHICH ACTIVITIES WILL BE ADDRESSED BY RPIP
- COORDINATING DEVELOPMENT OF CORRECTIVE PROGRAMS
- COORDINATING PROGRAM MODIFICATIONS
- PROVIDING INPUT INTO EVALUATION OF PROGRAM EFFECTIVENESS
- COORDINATING COMMUNICATIONS WITH NRC

**PROGRAM DIRECTOR  
M. P. ALEXICH**

**AEPSC ENGINEERING  
SUPPORT**

**PROGRAM ADMINISTRATORS**

**B. H. BENNETT  
F. S. VanPELT, Jr.**

### **RESPONSIBILITIES**

- ADMINISTERING PROGRAM ASSIGNMENTS
- DIRECTING SCHEDULED ACTIVITIES
- MAKING ADJUSTMENTS TO SCHEDULES
- COORDINATING MANPOWER
- TRACKING PROGRAM PROGRESS

**TASK COORDINATORS**

<b>AEPSC</b>	<b>PLANT</b>
<b>R. DISTEFANO</b>	<b>E. SMARRELLA</b>

## **APPENDIX B**

### **COMPLETED RPIP ACTIVITIES**

**THIS APPENDIX INCLUDES AN UPDATE OF THE  
COMPLETED ACTIVITIES PREVIOUSLY ADDRESSED  
IN SUBMITTALS AEP:NRC:0625C, AEP:NRC:0625D,  
AND AEP:NRC:0625E.**



1. SITE MANAGEMENT AND MANAGEMENT REVIEWS

1.1 OBJECTIVE

The objective of the site management and management reviews was to ensure that the plant runs safely and efficiently. This continues to be done by AEPSC management, by monitoring plant operations and providing engineering support and assistance which reflects a dominant interest in safety and reliability.

1.2 ACTIONS COMPLETED

1.2.1 Personnel Changes

The changes indicated in our February 7, 1983 submittal (AEP:NRC:0625C) were a new Plant Manager, a new Operations Superintendent and a new Fire Protection Coordinator. Further changes have been made and are discussed below. Also, a schedule for hiring additional people is discussed in Appendix C.3 to this letter.

1.2.2 Organization Realignment

As a point of clarification to our February 7, 1983 submittal, the Plant Manager now reports to the Vice President of Nuclear Engineering instead of the Executive Vice President of Construction and Engineering.

There have been additional realignment actions taken to enhance safety and reliability. Since July 1983, six onsite QA personnel now report directly to the Corporate QA Manager. Coincident with the QA realignment was the development of a site QC Department (formed in July, 1983). This QC Department now reports directly to the Plant Manager. Additional information on the status on these realignment activities is discussed in Appendix B, Section 8 and Appendix C.10 to this letter.

As of November 1, 1983, the Columbus portion of Corporate Quality Assurance has been realigned into two sections. The first section is QA Audits and Procurement. The second section is QA Engineering. The purpose of this realignment was to relieve the Corporate QA Manager of significant administrative work. This relief will allow additional management effort to be placed on improving the QA program.

As of December 1, 1983, the Nuclear Engineering Division was expanded to include additional personnel in the Operational Support Section and to manage that section as well as the Radiological Section. Some of the primary responsibilities of the Operations Support Section will be to administer design changes (Request For Change, RFCs) and the RPIP.

1.2.3 Nuclear Policy Statements

In the February 7, 1983 submittal, we identified six policy statements. The first statement stated that we are maintaining a highly

professional engineering organization to support the plant. During the December 8, 1983 RPIP workshop with the NRC, an example of the qualifications of the engineering staff personnel at AEPSC was presented. The example discussed was the Control Room Design Group. This group provides liaisons for the implementation of the Emergency Response Program. The group consists of 11 people. The average formal education for the group members was 17.5 years. The average nuclear experience for the group was 9.3 years.

The second policy statement addressed the use of the experience available in the nuclear industry. During the December 8, 1983 workshop, a listing of approximately 25 organizations, which have been used, was provided. Examples of those organizations included the Atomic Industrial Forum, Nuclear Operations and Maintenance Information System, the Ice Condenser Task Force, Technical Society Committees, and INPO Evaluation/Assistance Visits.

The third policy statement addressed the maintenance of a highly trained staff with effective procedures. With regard to the staff, on December 8, an example of the qualifications of the personnel in our Plant Technical Department was provided. Out of a total of 153 people in that department, the average formal education was 15 years and the average nuclear experience was 5 years. In addition in the past two years 30 nuclear navy trained personnel have been employed in our operations department. With respect to having effective procedures, Appendix C.2 to this submittal and Sections 1.2.4, 1.3.2, 1.3.4, 2.2.4, 4.3.2 and 4.6.3 of the February 7, 1983 submittal, reflect persistent efforts to maintain effective procedures.

The fourth policy statement addressed adherence to the operating license. The plans and schedules, for historical and future evaluations of conditions adverse to safety and not adhering to the plant license, are discussed in a response to the NRC's Confirmatory Action letter of November 17, 1983. The response is documented in submittal AEP:NRC:0858 dated January 20, 1984. These evaluations will be tracked as part of the RPIP. The results of these evaluations will be used to enhance compliance with the license.

The fifth policy statement addressed the plants dynamic industrial safety program. The program involves an in-plant safety committee, which includes hourly-employee representation. The success of the program has been demonstrated. As discussed in the December 8, 1983 workshop, the plant had worked 12 consecutive months prior to November 1, 1983 with only one disabling injury.

The sixth policy statement addressed the establishment of a formal ALARA Program. The ALARA Program became effective January 1, 1984. Some initial exposure trends have been performed. These trends were based on work function and job function and will be repeated after sufficient time has passed, to assess the successfulness of the ALARA Program. Since the ALARA Program is in place, it is no longer considered part of the RPIP.

The last sentence of Section 1.2.3 to the February 7, 1983 submittal, stated that AEPSC cognizant engineers are required to see that systems and equipment, assigned to them, are maintained and operated properly by review of operating records and by periodic inspections. The following clarifies this statement: The involvement of the cognizant engineers is participation with the plant during outages, equipment malfunctions and other as-needed situations. The record reviews include plant adverse reports (e.g. Licensee Event Reports), purchase orders and job orders. Equipment and systems are the basic responsibility of AEPSC Departments versus individual cognizant engineers. A sample of two outage months (specifically March and August 1983) demonstrates the AEPSC onsite involvement. Twenty-six AEPSC personnel in March and 67 AEPSC personnel in August were at the plant site. We believe that the increased onsite involvement is facilitated by the Corporate move from New York to Columbus, Ohio.

#### 1.2.4 Operations Department Procedures Review

This review included the normal operating procedures, surveillance test procedures, and annunciator procedures. This review included those procedures which had not been revised in the previous two year review cycle. The two year review cycle is established in instruction PMI-2010 and is consistent with ANSI Standard 18.7-1976, Section 5.2.15. The above procedures were reviewed for format and clarity. The number of Licensee Event Reports (LERs) associated with these procedures decreased from three in 1981 and four in 1982, to two in 1983. We have not attempted to confirm whether this reduction in LERs is either statistically sound or as a result of revising the above procedures.

One of the concerns, addressed in the February 7, 1983 submittal, was the control of temporary procedure change sheets. A recent review indicates that 131 procedures/instructions have four or more temporary change sheets, which have not been incorporated into the procedures/instructions by revisions. Appendix C.4 to this submittal addresses those 131 procedures and the schedule to resolve them.

#### 1.2.5 Position Descriptions

As addressed in the February 7, 1983 submittal, both the AEPSC and Plant personnel position descriptions have been updated, where necessary.

The February 7th letter indicated that the nuclear policy statements will be incorporated into position descriptions, where appropriate. The following clarifies this item: Annual job performance reviews at the plant are specifically accomplished by ensuring that supervisors discuss elements of the Plant Manager's policy statement (e.g. professionalism, cooperation, and compliance with regulations) with their subordinates. Nuclear policy statements will not be incorporated into position descriptions.

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#### 1.2.6 Management Reviews

This section was informational only. No changes are needed for this section.

#### 1.3 ACTIONS COMPLETED

##### 1.3.1 Management Reviews

This item indicates that consultants would continue to be used in 1983 to review management activities as long as deemed productive. Appendix C.5 to this submittal addresses the plans for an additional consultant's review in the area of quality assurance effectiveness. An evaluation of the findings addressed in previous consultants' reviews was made. No further actions are deemed necessary for the findings.

##### 1.3.2 Plant Manager's Instructions/Procedures Review

The efforts in this area have depended upon the revision of Plant Manager's Instruction (PMI) 2010. PMI-2010 controls the revision of all other Plant procedures. PMI-2010 has now been revised, establishing new criteria for the subsequent revisions of all Plant procedures. Attachment C.2 to this Appendix addresses the schedules for the revision of the remaining PMIs.

##### 1.3.3 Safety Committees

This item indicated that the Nuclear Safety Design Review Committee (NSDRC), Subcommittee on Audits, would review plant audits to identify weaknesses in managerial direction and to look for trends detrimental to quality. In addition, the Subcommittee would present significant findings to the NSDRC for their review. This program is in place.

The review functions of the NSDRC and of the Plant Nuclear Safety Review Committee (PNSRC) were re-evaluated based on the findings of the NRC Performance Appraisal Section's inspection of 1982 and the NRC's Confirmatory Action Letter (CAL) of November 17, 1983.

PNSRC instruction PMI-1040 was revised and issued on May 31, 1983. PMI-1040 was revised to redefine and amplify the PNSRC's duties and responsibilities; to establish criteria for selecting alternate members; to insure audit reports, inspection reports, etc., are reviewed; to insure compliance with 10 CFR 50.59 safety evaluations; to insure PNSRC open items are tracked; and to establish the use of consultants. In addition, yearly quality assurance audits are now scheduled to evaluate PNSRC's performance per PMI-1040.

Our response to the CAL is addressed in submittal AEP:NRC:0858 dated January 20, 1984. As indicated in that submittal, the NSDRC's charter and subcommittee charters have been revised to reflect the resolution of the concerns raised by the NRC. The NSDRC procedures and the Audit Subcommittee procedures have also been revised. A schedule is provided in AEP:NRC:0858 for revision of the remaining Subcommittees' procedures.

#### 1.3.4 Technical and Maintenance Department Instructions/Procedures Review

This activity was dependent upon the revision of PMI-2010, which is now complete. The schedule for reviewing and revising the remaining PMIs is addressed in Appendix C.2 to this submittal. The completion of that schedule will dictate whether Technical and Maintenance Department Instructions/Procedures will have to be reviewed and/or revised. If the Technical and Maintenance Department Instructions/Procedures need to be reviewed and revised, they will be appropriately scheduled.

#### 1.3.5 ALARA Program

As discussed in Section 1.2.3 of this Appendix, the ALARA Program has been established and became effective January 1, 1984.

#### 1.3.6 Training

Application will be made for INPO training accreditation within the INPO suggested schedule. This schedule has been agreed to by AEPSC senior management. Target dates for submittal for accreditation of the training program for Unit Operators, Auxiliary Equipment Operators, Reactor Operators, Senior Reactor Operators, and Shift Technical Advisors (STAs), is June 30, 1984. The target date for submittal for training accreditation of the remaining plant skills is June 30, 1986.

An in-plant Steering committee for this effort, consisting of Plant Management and Department Heads, was chartered on December 22, 1983, and has subsequently met on approximately one-week intervals. The primary objective of this Steering Committee is to guide the efforts to obtain INPO training accreditation. However, many related projects, aimed at improvement and better coordination of plant training in general, are being proposed, discussed, and implemented by this Committee.

In-house ability or capacity to perform the INPO training accreditation prerequisite self-evaluation does not presently exist. Therefore, proposals from six (6) vendors for this task were solicited and evaluated. On January 16, 1984, Data Design Labs was selected on the basis of proposal responsiveness, prior specific experience, strength of resumes, and competitive cost. Data Design Labs commenced work at the Plant during the week of January 23, 1984. The accreditation plans are submitted as internal goals and not as commitments.

We continuously review and revise our training program to adjust to better methods that develop. We seek INPO accreditation to provide recognition to our training program. However, we do not consider accreditation as a necessary part of the RPIP.

#### 1.3.7 Shift Technical Advisors Program

The STA group is recognized as a source of significant input to guide and improve Plant performance in general, as well as to develop



future managers/supervisors for the Plant. To that end, STAs have been given additional assignments designed to assist in improving Plant performance and efficiency. These assignments require participation in day-to-day activities, thereby increasing the STA's involvement with all Plant departments. Examples of the additional assignments are initial review of Condition Reports (including fact-gathering critiques, interviews with personnel involved and assessment to ensure corrective action is taken relative to Technical Specification requirements), and preparation of the Post Trip Review Procedure (which commenced immediately after the occurrence of the Salem ATWS/breaker event, now mandated by Generic Letter 83-28). In the near future, STAs will assume responsibility for preparation of all LERs, maintain a leadership role in Emergency Preparedness (unless a separate AEPSC/Plant group is created for this purpose), and participate in management development activities. The development activities include rotation into various Departments to gain a broad perspective of the requirements needed to manage and operate the D. C. Cook Nuclear Plant.

With the current staffing, the STA's primary functions are to provide technical assistance to the Shift Supervisors and to maintain current knowledge of Plant conditions. The full complement of approved STA positions is expected to be staffed within six (6) months. Based on the interest that has been expressed, several of the positions are very likely to come from experienced, licensed individuals already in our organization. The revised and expanded scope of the STA program is expected to be functioning by the end of 1984.

We know of no areas or activities, related to the current STA program, that present any adverse regulatory concerns. Therefore, the STA program will no longer be considered as part of the RPIP. The above staffing plans are provided as internal goals and not as commitments.

## 2. CORRECTIVE ACTIONS

### 2.1 OBJECTIVE

The objectives of this section are to insure that corrective actions are timely, effective, and made known to affected personnel; and that a follow-up system is employed to track long-term commitments.

### 2.2 ACTION COMPLETED

#### 2.2.1. Early Notice of NRC Findings

The purpose of this item is to assure the expedient distribution of NRC exit meeting minutes to all affected parties. This expedited distribution would provide for more timely response to identified adverse conditions. The measures addressed in the February 7, 1983 submittal are functioning. Therefore, no further actions are necessary.



### 2.2.2 Survey of Existing NRC Commitments

The NSDRC Subcommittee on Plant Occurrences is monitoring LERs to assure that commitments are appropriately controlled. The AEPSC Nuclear Engineering Division is monitoring responses to NRC inspection reports and bulletins to insure that included commitments are controlled.

### 2.2.3 Commitment List

The Action Item program has been established and is functioning. General Procedure 2.2 is being revised to reflect enhancements (e.g. the program now displays commitment originator) to the Action Item program. The schedule for revising G.P. 2.2 is discussed in Appendix C.6 of this submittal.

### 2.2.4 Design Changes

General Procedure 25 has been revised to incorporate temporary change sheets. These temporary change sheets addressed: Change sheet control; management monitoring of the design change progress; the NSDRC design change review process; the safety and licensing review requirements for temporary waiver letters; handling of as built drawings; design/implementation sequence, engineering completion verification; clarification of lead engineers job description and responsibilities; the separation of engineering design changes and plant modifications; and clarification of transmittal requirements for design changes. These temporary sheets were included in Revision 1 to G.P. 25.

G.P. 28, which addresses the Change Control Board Charter, was not affected by the Revision 1 changes to G.P. 25. The schedules to review and revise the PMI-5040 and PMI-5045 are addressed in Appendix C.2 to this submittal.

The January 20, 1984 submittal (AEP:NRC:0858), which responds to the NRC Confirmatory Action Letter, provides a schedule to again revise G.P. 25 (Revision 2). Revision 2 will address the design verification program. A Temporary Procedure change, TP-1 to G.P. 25, Revision 1, addresses the design verification program. The schedule for Revision 2 to G.P. 25 will be monitored as part of this RPIP.

### 2.2.5 Alarms Review

To date, 262 problem alarms have been identified in the control room. Out of these 262 alarms, approximately 45 alarms have been resolved. The schedule to resolve the remaining problem alarms is discussed in Appendix C.8 to this submittal.

## 3. SURVEILLANCE PROGRAM CONTROLS

### 3.1 OBJECTIVE

The objective of this item is to reduce the possibility of not conducting a surveillance by a required date.



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### 3.2 ACTIONS COMPLETED

#### 3.2.1 Computer-Based Surveillance

All Technical Specification surveillances have been entered into the computer data base.

Plant personnel have requested some enhancements to the existing computer program. The second in a series of meetings between Plant and Corporate personnel is scheduled for February 8 and 9, 1984 to discuss the desired enhancements. The enhancements will be tracked as part of Appendix C.9 to this submittal.

A manual method of controlling scheduled surveillances is used, and will continue to be used until the computer program has proven to be satisfactory.

### 4. PLANT OCCURRENCES

#### 4.1 OBJECTIVE

The objectives of this item are to identify the root causes of abnormal events and to take corrective actions to reduce the chance of recurrence.

#### 4.2 ACTIONS COMPLETED

##### 4.2.1 Personnel Errors

A formalized program has been instituted which requires the individuals involved in personnel errors to provide their own assessment of the event. Specific information about the error(s) is required to be outlined in an event evaluation form. This practice forces the individual to reconstruct the event, gives him an opportunity to state his case, and allows him to make suggestions to prevent recurrence.

The event description is reviewed by the immediate supervisor and the department head. Actions taken to prevent recurrence, including any administrative actions, are indicated on the event evaluation form.

The entire packet is reviewed by the Plant Manager.

The progress made in reducing the number of reportable events caused by personnel errors is difficult to quantify. One reason is that a very conservative approach has been taken during the past year in classifying events as personnel errors. Another reason is changes in technical specification requirements, such as inclusion of all fire doors in the specification for "Penetration Fire Barrier".

Recommendations made through the program have resulted in improved training programs, procedural changes, and corrective disciplinary actions.

#### 4.2.2 Operating Shifts

As addressed in the February 7, 1983 submittal, we have initiated a 5-shift operation at the plant. The result was the immediate reduction of 20 hours per month of overtime per operator during requalification training. No further actions related to operation shifts are planned at this time. However, it is noted recently approved staffing augmentation will provide a greater allowance for training lead time, redundancy, and attrition with a salutary effect on operator manning.

#### 4.3 ACTIONS COMPLETED

##### 4.3.1 Unit Designation Labeling

All Turbine and Auxiliary Building 600 volt breakers have been color coded and labeled. Color coding of remote shutdown stations, spray additive tanks, sample panels, and four-kilovolt switchgear breakers, is scheduled for completion on May 18, 1984. Schedules for identifying and labeling valves, are addressed in Appendix C.1 to this submittal. These labeling activities will reduce the probability of personnel error.

##### 4.3.2 Equipment Control and Status

Revision 6 and 7 of PMI-2110, concerning the equipment control Clearance Permit System, were recently issued. The revisions combined two very complex documents (PMI-2110 and PMP-2110), which had numerous temporary changes. The documents and temporary changes contained a variety of commitments or actions not related to the proper handling of equipment tagouts. Revisions 6 and 7 provided one relatively concise document addressing the objective of proper tagout and return to service of equipment. INPO Good Practices and INPO Evaluations Recommendations, NRC comments, and internal difficulties were addressed in these revision efforts. A plant work control/test group is being established which may result in further changes in organizational assignments/responsibilities in the Clearance Permit system. The further changes are not necessary for an adequate Clearance Permit system. An adequate Clearance Permit system is presently in place. Therefore, this item will no longer be addressed in RPIP.

##### 4.3.3 Personnel Errors

The program addressed in Section 4.2.1 of this Appendix will be continued.

##### 4.3.4 Independent Verification

The Independent Verification Program is addressed in Appendix C.7 to this submittal.



## 5. COMMUNICATIONS

### 5.1 OBJECTIVE

One objective of this item was to improve communications and team work between AEPSC and the site, among the site sections, and among the AEPSC engineering sections. Additional objectives were to increase awareness of regulations, and to improve the attitude toward complying with regulations and responding to NRC findings and concerns.

### 5.2 ACTIONS COMPLETED

#### 5.2.1 Speakers Bureau

The practice of providing Speakers Bureaus has continued through 1983. During 1983 presentations have been provided by the Vice President Engineering Administration, the Vice President Information Systems, the Senior Vice President Electrical Engineering, the Vice President Mechanical Engineering, the Quality Assurance Manager, and the Vice President Nuclear Engineering. An example of a speaker bureau agenda is the one prepared for the most recent December 7, 1983 meeting. The respective program was provided by the Vice President Mechanical Engineering and his staff. The theme of that program was "Protect Our Steam Generators." The agenda included discussions on basic steam generator design, water chemistry considerations, future plans for improving steam generator chemistry, problems and corrective actions taken (e.g., erosion damage - relocation of steam dumps, grating), condenser retubing program, normal startup activities, and special operational considerations.

The Speaker Bureau has proven very beneficial in establishing and maintaining communications between AEPSC Corporate Management and the Plant's staff. Though not tangible, it is believed that the Speaker Bureaus have fulfilled their intended objectives of improving communications, team work, and attitude, as well as increasing awareness. Therefore, even though the Speakers Bureau is intended to be continued on a nonregular basis, we believe this communication aspect of the RPIP is in place.

#### 5.2.2 Management Meetings

With the geographic separation existing between AEPSC in New York and the D. C. Cook Nuclear Plant in Michigan, an objective was set to hold "Management Meetings" on a regular basis to insure necessary interface and close cooperation. Therefore, formal scheduled meetings were arranged with a prepared agenda, comprehensive briefing books, and detailed minutes. The meetings continued in this format until the summer of 1983, the time of the Corporate move to Columbus, Ohio.

Subsequently, commuting time between the organizations has been reduced and more frequent meetings between senior plant and corporate managers have resulted. Not only do the Plant Manager and the Vice President for Nuclear Engineering confer daily by phone, but the objectives of frequent face-to-face conferences and discussions can be



more easily satisfied. It is felt that the administrative burden of formalized meetings between the Plant Manager and his immediate supervisor is nonproductive, inappropriate, and inimical to the close working relationship we desire. It is believed that the objectives of the program have been achieved and it is planned to continue close coordination and frequent personal meetings at both the plant and corporate sites.

#### 5.2.3 Communications between AEP and the Site

As identified in the February 7, 1983 letter, guidelines for telephone communications between AEPSC and the plant staff were issued in a letter from the Executive Vice President of Construction and Engineering, on October 19, 1981. The guidelines are still in effect.

#### 5.2.4 Communications among Site Sections

The plan-of-the-day meetings addressed in the February 7, 1983 letter, continue to be effective in planning the resolution of problems. Therefore, it is believed that this aspect of the improvement program is in place.

#### 5.2.5 Communication Among AEPSC Engineering Sections

The manner in which activities are controlled by the NSDRC has provided for a strong senior engineering management interface. This interface has provided a mechanism for improved communications between all of the engineering sections. Although communications continue to improve, we believe this aspect of the RPIP is in place.

#### 5.2.6 Regulatory Compliance Presentation

This element of the RPIP is consistent with the speaker bureau and was intended only to be a one time event. No further actions with this aspect of the RPIP are planned.

#### 5.2.7 Engineering Assignments at the Plant

Our February 7, 1983 submittal stated that AEPSC based engineers would be assigned to the plant for a period of training and to act as liaisons. Some such assignments have been made by the engineering division. The feasibility of continuing these assignments is not practical for the immediate future, due to the personnel losses resulting from the Corporate move to Columbus.

Instead, there has been a concerted effort to involve many junior personnel in shorter visits to the plant in connection with their immediate responsibilities. Examples of their responsibilities include preliminary planning for plant modification or post-installation inspection, presentation of training lectures, and participation as oversight audit team members. Corporate engineers have additionally been assigned to support the plant in special evolutions, such as refueling, start-up, and infrequently performed tests.

In addition, the cross-fertilization of experience has been promoted by permanently assigning one supervisor from the Corporation to the plant. In addition, at least two senior supervisors are being reassigned from the plant to the corporate staff.

While training assignments to the plant will be made in the future, objectives are being met through specific visits spread over a much larger number of corporate personnel, and through reassignments of experienced plant personnel to bring the necessary operating perspective to the corporate staff. Therefore, we believe this aspect of the RPIP is effectively in place.

### 5.3. ACTIONS COMPLETED

#### 5.3.1 Speakers Bureau

Reference Section 5.2.1 of this Appendix.

#### 5.3.2 Managements Meetings

Reference Section 5.2.2 of this Appendix.

#### 5.3.3 Training

As indicated in the February 7, 1983 submittal, the objective of this item was to have an improved attitude toward complying with regulations and responding to NRC findings and concerns. In pursuit of this objective, the general employee training program was revised in February of 1983 with more emphasis on how to make the D. C. Cook Nuclear Plant better. Additional segments of this program were added approximately in March and November of 1983. These segments placed emphasis on an individual's responsibility in maintaining the integrity of fire doors (e.g. do not block doors open) and steam generators (e.g. personnel rules on maintaining cleanliness).

#### 5.3.4 Engineering Assignments at the Cook Plant

Reference Section 5.2.7 of this Appendix.

#### 5.3.5 Plant Manager Weekly Reports

The Plant Manager no longer uses Weekly Reports to identify items which require follow-up.

### 6.0 WORK CONTROL

#### 6.1 OBJECTIVE

The objectives of this item are to ensure that work is performed on designated equipment; to control the scope of work; and to review and revise, as necessary, the testing requirements and documents.

## 6.2 ACTIONS COMPLETED

As indicated in the February 7, 1983 submittal, the I&M Construction organization is now required to work in accordance with plant approved procedures. In addition, contractors at the D. C. Cook Nuclear Plant are required to abide by either the D. C. Cook Nuclear Plant procedures or by an approved Quality Assurance program. Two of the onsite contractors' quality assurance manuals were submitted for review subsequent to November 1, 1983. The quality assurance department has completed a review of those two manuals. The third contractor's QA manual is presently under review. The scheduled approval dates for all three manuals is March 30, 1984. The progress of these contractors manuals is being tracked as part of Appendix C.10 to this submittal.

## 6.3 ACTION UNDERWAY

The schedule for review and revision of PMI-2290 which specifies the requirements for controlling work activities at the Cook Plant, is addressed in Appendix C.2 to this submittal.

## 7. SAFETY-RELATED SYSTEMS REVIEW

### 7.1 OBJECTIVE

The objective of this section is to confirm that flow diagrams accurately reflect the as-built configuration of the systems in the plant; that components are uniquely identified; and that components are labeled appropriately.

### 7.2 ACTIONS UNDERWAY

The program to confirm the accuracy of our flow diagrams and to assure components are appropriately labeled is addressed in Appendix C.1 to this submittal.

## 8. QUALITY ASSURANCE/QUALITY CONTROL ORGANIZATIONS AND FUNCTIONS

On July 1, 1983, the QA Audit Section of the Plant QA Department was transferred to the AEPSC QA Department. This AEPSC QA Section continues to reside at the D.C. Cook Plant site under the direction of the AEPSC QA Supervisor who reports solely to the AEPSC Manager of QA.

The primary functions of the AEPSC Site QA Section are as follows:

- Conduct audits of the content and implementation of the Plant's Quality Assurance Program, including those of the Plant Nuclear Safety Review Committee.
- Provide support to the AEPSC Nuclear Safety and Design Review Committee Audit Program.
- Provide support to the vendor qualification and audit program.



- Conduct audits of the Site Construction, Contractor and Craft activities.
- Perform surveillances on Plant Instructions and Procedures.
- Provide review of Personnel Certification records for all Site Construction, Contractor and Craft Personnel who require certification prior to work performance.
- Conduct periodic surveillances of work in-progress, operational events, and other related plant activities.
- Provide support to the Plant Manager and his staff on matters which relate to QA including the interpretation of Codes and Standards and the conduct of special investigations and reviews.

Since July 1, 1983, the following aspects of the QA reorganization have been accomplished:

- The AEPSC Site QA Section has been staffed and all audit personnel have completed a training course in nuclear QA standards and auditing. The training course was provided by an outside contractor.
- A 1984-85 Audit Schedule has been developed, approved and is in use.
- A Codes and Standards Matrix has been developed and is presently being used for review and audit purposes. The matrix provides a correlation between regulatory requirements and commitments (e.g., ANSI's, CFR's, etc.) and the Plant's QA Program.
- A Systems Training Program has been established for all AEPSC Site QA Audit personnel. The program will commence in February, 1984.
- Two NSDRC Audit Support Programs have been developed and initiated. These programs encompass the Surveillance and Limiting Condition for Operation aspects of the Plant's Technical Specifications.
- Several changes have been made to the audit program relative to the conduct, issuance and follow-up of audits. Examples of the changes are: increasing the depth of the programmatic assessments through the use of the Codes and Standards Matrix, prompt feedback to the Plant relative to audit response acceptability, establishing an improved audit program status system on the word processor and improving the audit conduct/issuance time frame.

The implementing procedures relative to the QA review and audit program are presently under revision. The schedule for revising these procedures is addressed in Appendix C, Attachment C.10 to this submittal.

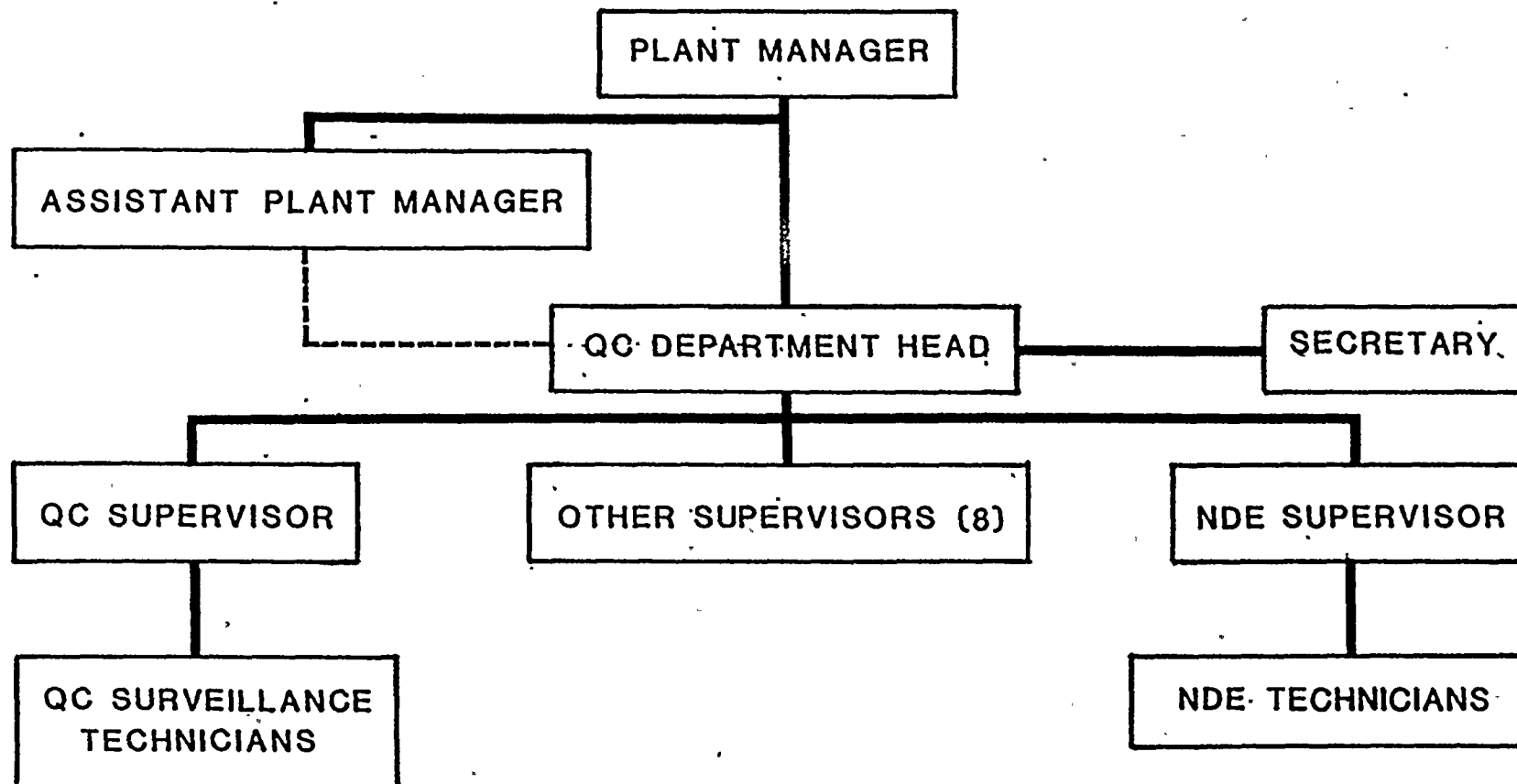


Consistent with the QA reorganization, the following activities have been accomplished within the QC Section at the plant:

- An acting QC Supervisor has been designated.
- Position descriptions have been prepared for the QC staff.
- The current staff consists of 13 people.
- A training program has been defined for new QC and Nondestructive Examination personnel.
- Level II radiography training was given to QC personnel.
- As of July 1, 1983, Maintenance Procedure hold points have been monitoring by QC personnel.
- 368 QC surveillances have been performed since July 1, 1983.
- Contractor personnel were added to the QC staff to perform nondestructive examinations.

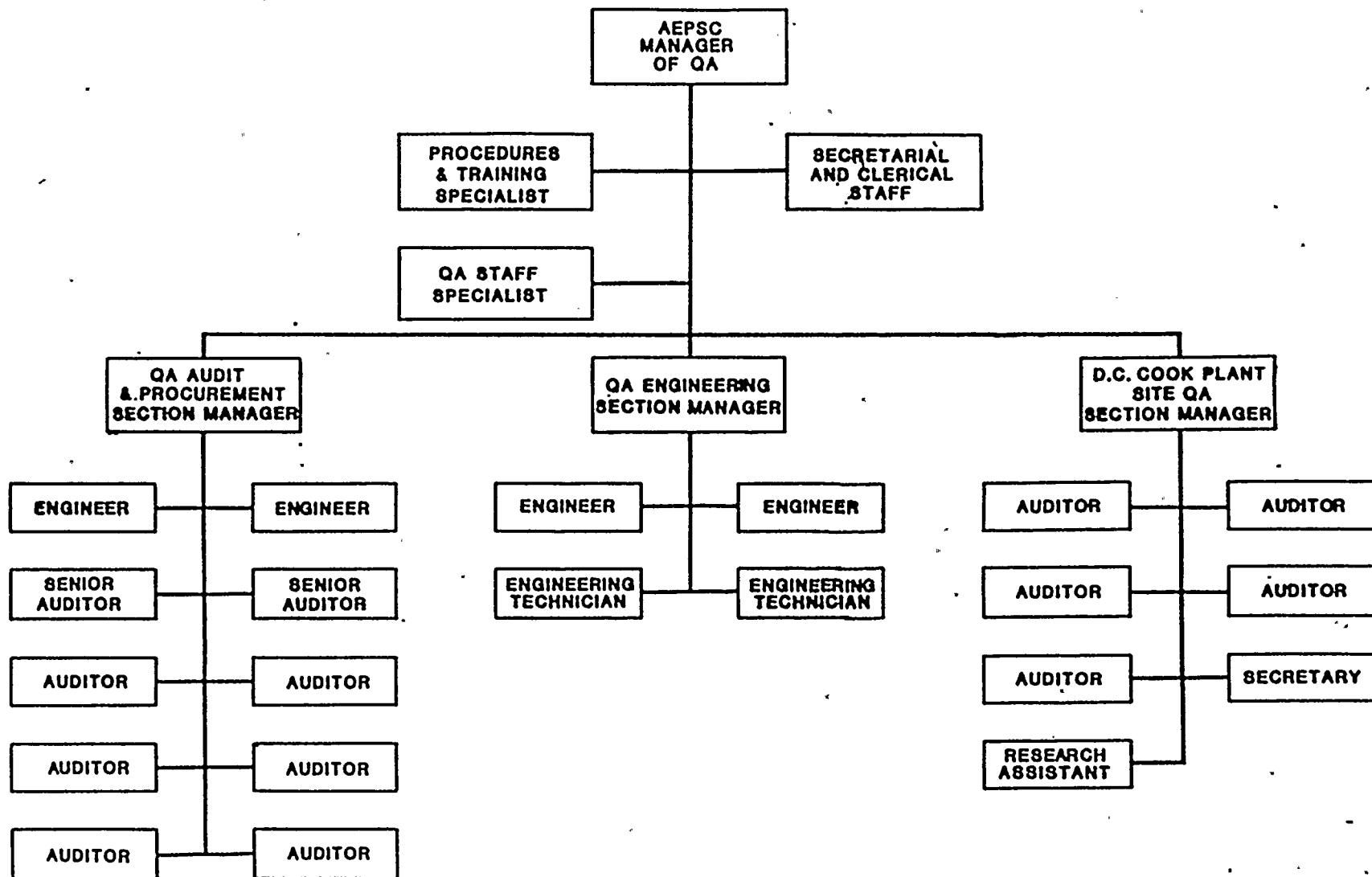
# PAS/SALP CONCERNS ADDRESSED

## QUALITY CONTROL DEPARTMENT ORGANIZATION





# QA ORGANIZATION



## **APPENDIX C**

### **CURRENT RPIP ACTIVITIES ACTION PLAN**

- 1. SCOPE OF RPIP ACTIVITIES**
- 2. STATUS AND RESULTS OF RPIP ACTIVITIES**



## C.1 DRAWING AND LABELING ACTIVITIES

### 1.1 SCOPE OF ACTIVITY

We are performing a joint effort between the Plant and AEPSC to confirm that flow diagrams accurately reflect the "as-built" configuration of systems; that components are uniquely identified; and that components are labeled appropriately.

The target date for completing the confirmation of the accuracy of the safety related flow diagrams is May, 1985. This date, which is based on the attached schedule, covers the accessible portions of the listed systems. The schedule for walking down the flow diagrams has generally been prioritized according to safety significance and our desire to review each of the safety related flow diagrams on either unit as soon possible to confirm that no major discrepancies exist. (Generally, the unitized system drawings for each unit are similar so that review of either units' drawing will disclose any potential major discrepancies). Since portions of many of the flow diagrams listed have limited access due to personnel radiation exposure and are accessible only during outages, our scheduled walk down program indicates the starting dates for walk down of the accessible portions of the systems. The inaccessible portions of flow diagrams noted during the walk down will be listed and scheduled for special walk downs during unit outages consistent with time and manpower availability. The timing of the schedule is based on the experience gained from the walkdown of the first of these flow diagrams and anticipates the use of a team of approximately 14 to 18 people (corporate and plant personnel). The overall schedule is subject to adjustment and revision as we gain more experience during the program or if any major discrepancies are noted.

If significant discrepancies are identified, a condition report will be written and the flow diagram will be marked to reflect the condition report.

Color coding of remote shutdown stations, spray additive tanks, various sample panels, and breakers in the four-kilovolt switchgear rooms is targeted for completion on May 18, 1984.

### 1.2 STATUS AND RESULTS

Flow diagram #1-5106A, for the Unit 1 Auxiliary Feedwater System was walked during the week of January 16-20, 1984. The walkdown revealed no discrepancies of safety significance in either the "as-built" accuracy of the drawings or the identification of the system components on the drawings. Some minor discrepancies were identified.

# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-1

### DRAWING ACCURACY

SYSTEM WALKDOWN		1984												1985											
		J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A				
		(•DATE OF START WALK)																							
AUX. FEEDWATER	U-1	COMPLETE																							
	U-2	• 2/20																							
CHEM. & VOLUME CNTL.(CHARGING)	U-1	• 11/12																							
	U-2	• 2/27																							
EMERGENCY CORE CLG. (S.I.)	U-1	• 11/26																							
	U-2	• 3/12																							
E.C.C. (RESIDUAL HT. REMV.)	U-1	• 12/3																							
	U-2	• 3/19																							
EMERGENCY DIESEL GENERATOR	U-1	• 12/10																							
	U-2	• 3/26																							
COMPONENT CLG. WATER	U-1	• 12/24																							
	U-2	• 4/16																							
CONTAINMENT SPRAY	U-1	• 1/7																							
	U-2	• 5/7																							
REACTOR COOLANT	U-1	• 1/14																							
	U-2	• 5/14																							
ESSEN. SERV. WATER	U-1	• 1/28																							
	U-2	• 5/28																							
CONT. VENT/AIR RECIRC.	U-1	• 2/4																							
	U-2	• 6/4																							
AUX. BLDG. VENT	U-1,2	• 6/11																							
CNTL. RM. VENT	U-1	• 2/11																							
	U-2	• 6/25																							

# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-1

### DRAWING ACCURACY ( CONT'D )

#### SYSTEM WALKDOWN

1984

1985

J F M A M J J A S O N D J F M A M J J A

WASTE DISPOS. (GAS)

U-1,2

●7/2

MAIN STEAM

U-1

●2/18

U-2

●7/9

MAIN FEEDWATER

U-1

●3/4

U-2

●7/23

CVCS-BORON MAKEUP

U-1,2

●7/30

#### CONTAINMENT PENETRATIONS SAFETY RELATED :

CMPRSD. AIR-CNTL. AIR

U-1,2

●8/6

SPNT. FUEL PIT

U-1,2

●8/13

WST. DISPL-LIQ. (VENT & DRAINS)

U-1,2

●8/20

NON-ESSEN. SERV. WAT.

U-1

●3/18

U-2

●8/27

WELD CHANNEL PRESS.

U-1

●3/25

U-2

●9/3

MAKE-UP WAT., PRM. WAT.

U-1,2

●9/10

ICE CONDENSER REFRIG.

U-1

●4/1

U-2

●9/17

NUC. SAMPLING

U-1

●4/15

U-2

●10/1

COMPLETE

COLOR-CODING OF REMOTE SHUTDOWN  
STATIONS, TNKS. PNLS., & SWITCHGR. BRKRS.

●5/18



C.2. PLANT PROCEDURES REVISED PER PMI-2010 AND THE CODES AND STANDARDS MATRIX

SCOPE OF ACTIVITY

This activity has been dependent on the completion of Revision 8, to the Plant Manager's Instruction (PMI-2010) titled "Plant Manager and Department Head Instructions, Procedures and Associated Indexes" and the development of the Codes and Standards Matrix. Both of these activities are now complete.

PMI-2010 describes how all other plant procedures are to be written or revised. Revision 8 to PMI-2010 provided such changes as additional background references (e.g. ANSI N45.2 - 1977), special procedure requirements for contractors, format changes, review and approval flowpaths, and periodic reviews.

The Codes and Standards Matrix provides, for each PMI, an index of the regulations and standards with which the respective activities at the D. C. Cook Nuclear Plant must comply.

The target date for completing the review and revision activities related to the remaining PMIs is December, 1985. The target date is based on the two year review cycle established in PMI-2010, which is consistent with ANSI Standard 18.7-1976. Sixteen PMIs have been placed on the attached (Attachment C.2.a) prioritized schedule due to the significant impact they have on plant activities (e.g. welding).

Certain PMIs affect lower-tier procedures. If the review of the PMIs reveal any significant deficiencies, the respective lower-tier procedures will be appropriately scheduled for review and, if necessary, revised. If significant changes are necessary for the PMIs or the lower-tier procedures and there is a lengthy revision period, interim controls will be established (such as full-page inserts) to effect the changes.

All plant procedures are being entered onto word-processors to expedite revision activities. Attachment C.2.b provides the status and schedule of this activity.

It should be noted that the QA department is auditing and reviewing PMIs and the lower-tier procedures against the documents identified on the Codes and Standards matrix. The audits are performed as part of the biennial audit cycle.

ATTACHMENT C.2.a

PRIORITIZED SCHEDULE FOR PMI REVIEW

<u>Estimated Completion Date</u>	<u>PMI #</u>	<u>Subject</u>
completed 12-1-83	2010	<u>Plant Manager and Department Head Instructions, Procedures and Associated Indexes</u> - describes content and format of all procedures and instructions in the plant.
5-1-84	2110	<u>Clearance Permit System</u> - describes methods and controls used to remove and restore plant equipment.
5-1-84	2140	<u>Bypass of Safety Functions</u> - describes methods and administrative controls used to perform temporary modifications; such as lifted leads, jumpers, grounds, etc.
3-1-84	2270	<u>Fire Protection and Safety Equipment</u> - describes areas which are covered by fire protection (Tech Spec and otherwise) and methods under which work can be performed in these areas.
5-1-84	2290	<u>Job Orders</u> - primary vehicle for requesting work be performed and contains the necessary instructions and documentation that the work is completed.
4-1-84	4020	<u>Operating Procedures</u> - describes purpose of the various Operations Department procedure series and outlines format where it differs from requirements of PMI-2010.
3-1-84	4030	<u>Surveillance Testing</u> - lists every Tech Spec Surveillance requirement and the responsible department.
3-1-84	4050	<u>Fuel Handling</u> - establishes administration controls and responsibilities for all activities involving the movement of nuclear fuel.
4-1-84	5020	<u>Maintenance and Repair Work</u> - base document from which procedures are prepared to maintain and repair safety related equipment.

ATTACHMENT C.2.a (continued)

<u>Estimated Completion Date</u>	<u>PMI #</u>	<u>Subject</u>
3-1-84	5040	<u>Design Changes</u> - describes type of design changes and the administrative controls necessary to implement and document the installation of these changes.
5-1-84	5050	<u>Special Process Control</u> - establishes administrative controls for special processes such as welding, heat treating, and nondestructive testing for Class 1 systems.
5-1-84	5060	<u>Controls of Special Tools and Measuring and Test Equipment</u> - establishes administrative controls for periodic calibration and adjustment of test equipment and measuring devices.
5-1-84	5070	<u>Inservice Inspection</u> - establishes administrative controls to conduct an inservice test program in accordance with the requirements of ASME Code Section XI and Tech Specs.
4-1-84	6010	<u>Radiation Monitoring and Protection</u> - base document from which procedures are prepared to limit radiation exposure to within the acceptable limits.
4-1-84	6020	<u>Chemical/Radiochemical Control of Coolants</u> - base document from which procedures are prepared to control the quality of coolants in various systems and provide corrective action if limits are exceeded.
4-1-84	6030	<u>Instrument Maintenance and Calibration</u> - base document from which procedures are written establishing requirements for a calibration system for safety related instrumentation and test equipment.
4-1-84	6040	<u>Engineering/Performance Test Procedures</u> - base document from which procedures are written to assess system and component performance.

ATTACHMENT C.2.b

SCHEDULE FOR ENTERING PROCEDURES  
UNTO WORD-PROCESSORS

	Percent complete	of	Total	100% expected by:
(1) PMIs	100 %		67	
(2) PMPs	57 %		75	*
(3) MHIs	4 %		25	4/1/84
(4) MHPs	13 %		270	4/1/84
(5) THIs	0 %		16	(To be phased out)
(6) Performance	89 %		80	10/1/84
(7) Nuclear	100 %		24	--
(8) C&I	80 %		399	10/1/84
(9) Environmental	95 %		6	1/31/84
(10) Chemical	95 %		152	1/31/84
(11) Rad Protection	95 %		219	1/31/84
(12) Administ./Acctg.	95 %		24	3/1/84
(13) Stores	100 %		26	--
(14) QC	100 %		48	--
(15) Training	-- %		--	(Have no procedures)

\*Many PMPs are being incorporated into PMIs

# D. C. COOK NUCLEAR PLANT

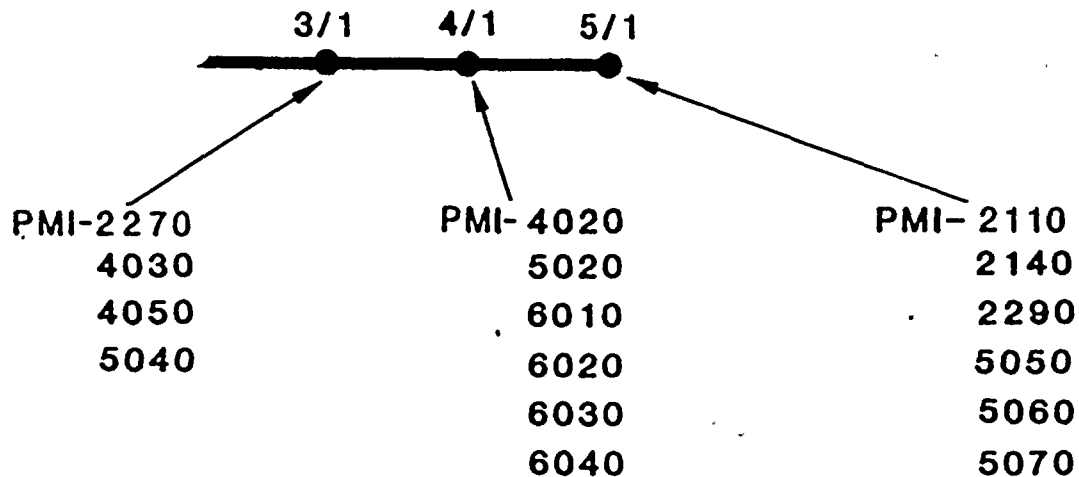
## R P I P ACTIVITY C-2

### PLANT PROCEDURES REVIEW PER PMI-2010

1984

J	F	M	A	M	J	J	A	S	O	N	D
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#### REVIEW PMIs:



### C.3 AUGMENTATION AND REORGANIZATION OF PLANT PERSONNEL

#### 3.1 SCOPE OF ACTIVITY

Reviews of the D. C. Cook Nuclear Plant organization revealed that the plant workloads will be more effectively and efficiently accomplished with addition of 73 people and some reorganization.

Additional people have been approved for hire. These people will be responsible for the additional workloads imposed by new regulatory requirements and by commitments made to NRC for improved operation. The majority of the increases would fall into the following areas:

- 10 - Quality Control personnel
- 18 - Control & Instrumentation Technicians
- 11 - Reactor/Auxiliary Equipment Operators
- 10 - Radiation/Chemistry Technicians

The Planning Department at the Plant has been reorganized to bring more order to the planning activities. All major planning activities (e.g. outages, design changes) will be centralized within this group. This will result in improved planning and communications with other departments and AEPSC. The other departments will be relieved of their responsibilities to furnish people to coordinate design change activities.

#### 3.2 STATUS AND RESULTS

Approval for the additional personnel was granted by the AEPSC Chairman of the Board on November 22, 1983. Since that date, ten individuals have accepted offers of employment. In addition, 120 resumes have been received as a result of the layoff at Marble Hill. On January 18-20, 1984, a Plant team interviewed approximately 44 prospective employees at that facility.

Four individuals are being reassigned within the plant to the QC staff, effective February 1, 1984.

Hiring of Quality Control personnel and Shift Technical Advisors has been given the highest priority.

The majority of the open positions are expected to be filled by June 1, 1984.

# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-3

### AUGMENTATION OF PLANT PERSONNEL

1984

J	F	M	A	M	J	J	A	S	O	N	D
---	---	---	---	---	---	---	---	---	---	---	---

1/18-20

6/1

PLANT TEAM  
INTERVIEWED  
PROSPECTIVE  
EMPLOYEES AT  
MARBLE HILL

FILL ALL POSITIONS,  
WITH PRIORITY ON  
STA & QC POSITIONS

(10 POSITIONS FILLED AS OF 1/20/84)

#### C.4 TEMPORARY PROCEDURE CHANGES

##### 4.1 SCOPE OF ACTIVITY

There are 131 plant procedures that have four or more Temporary Procedures (TPs) changes which have not been incorporated into the respective procedures. The target date for eliminating all procedures with four or more TPs is June 1, 1984. This commitment is contingent upon the following:

- Procedures which are revised prior to each use (e.g. B&C Leak Test procedure) are not included, as their change status at the time of completion of the procedure is of no consequence to the next performer(s) of the procedure.
- Reduction of active changes may be accomplished by procedural revision, incorporating previous changes into one full-page insert, and by making all changes full-page inserts (and maintaining a current List of Effective Pages).

The target date for incorporating all other non-fullpage inserts is December 31, 1984. This will include those procedures with three or less TPs.

Effective January 1, 1984, changes are to be by full page inserts, unless there are justifiable, overriding reasons of plant/personnel safety to do otherwise. Full page inserts require no reference back to change sheets and can be readily checked for being up-to-date by reference to the list of effective pages. We will continue to emphasize the elimination of nonessential "on-the-spot" changes.

Changes to PMIs and Plant Manager's Procedures (PMPs) require the approval of the Plant Manager or one of the Assistant Plant Managers prior to implementation.

##### 4.2 STATUS AND RESULTS

The schedule for incorporating TPs will commence February 1, 1984.

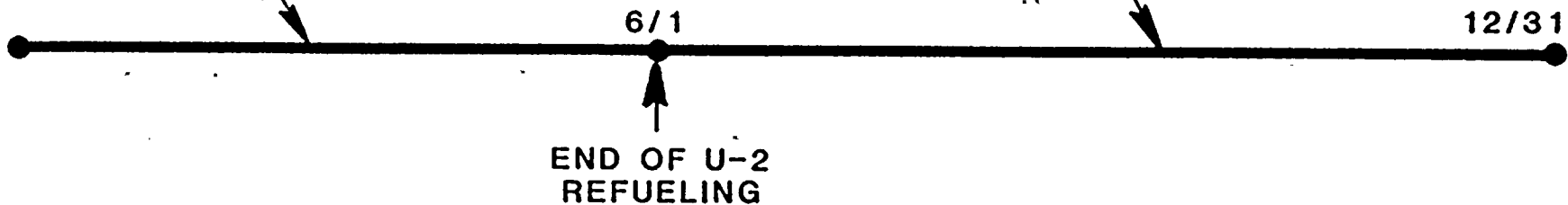
**D. C. COOK NUCLEAR PLANT**  
**R P I P ACTIVITY C-4**  
**TEMPORARY PROCEDURE CHANGES**

1984

J	F	M	A	M	J	J	A	S	O	N	D
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FOR PROCEDURES  
WITH 4 OR MORE  
T.P.'s (131 TOTAL)  
REDUCE T.P.'s TO THREE (3)  
OR LESS (33 PROCEDURES  
PER MONTH)

INCORPORATE ALL T.P.'s  
INTO PROCEDURES





## C.5 MANAGEMENT REVIEW OF QA PROGRAM

### 5.1 SCOPE OF ACTIVITY

On December 30, 1983, bid invitations were requested from ten contractors for proposals to provide a complete review and assessment of the adequacy and effectiveness of the QA program. The scope of the review and assessment is to include the following:

- a. Compliance with Regulatory Commitments pertaining to the QA Program.
- b. Format, content, consistency, and ease of implementation of procedures and instructions.
- c. Identification of program deficiencies.
- d. Provide management with a report of nonconformances, deficiencies, and assessment of the adequacy of all areas of the Quality Assurance Program.
- e. Recommend, as appropriate, improvements in the QA Program.
- f. Address, as a minimum, program compliance with licensing requirements, uniformity of application of the QA program at both corporate and plant levels, and ease of implementation of the QA program.

The target date for selecting a contractor is February 29, 1984. The target date for completing the review and providing the report to AEPSC is June 1, 1984.

### 5.2 STATUS AND RESULTS

Proposals have been received from all ten contractors and are currently under review.



# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-5

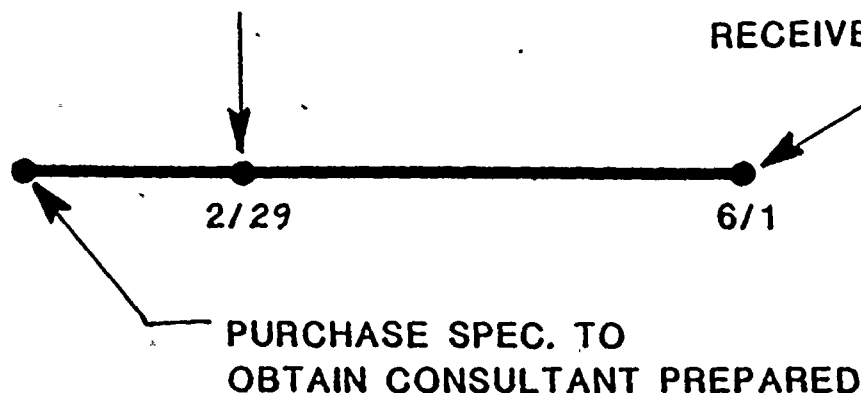
### MANAGEMENT REVIEW OF QA PROGRAM

1984

J	F	M	A	M	J	J	A	S	O	N	D
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SELECT CONSULTANT

RECEIVE CONSULTANT REPORT AND REVIEW





## C.6 ACTION ITEM COMMITMENT LIST

### SCOPE OF ACTIVITY

A computerized program has been established and is functioning to track commitments made to the NRC. The commitments that are tracked include those made in License Event Reports (LERs) and in responses to NRC inspection reports and bulletins. The NSDRS Subcommittee on Plant Occurrences is monitoring LERs to assure that commitments are entered into the Action Item program. The AEPSC Nuclear Engineering Division is monitoring responses to NRC inspection reports and bulletins to assure commitments are entered into the Action Item program.

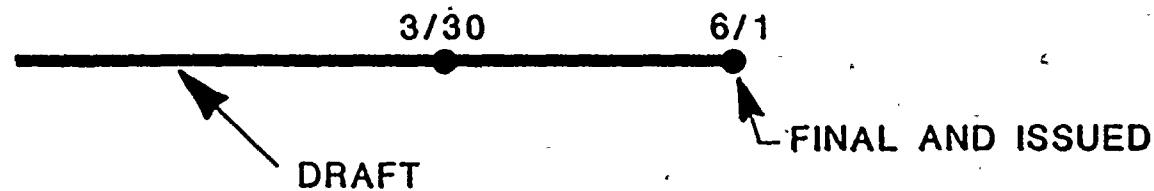
General Procedure 2.2 has to be revised to reflect enhancements (e.g. display the originator, display closeout date) that have been made to the Action Item program. The draft of this procedure is scheduled to be submitted for review on March 30, 1984. The procedure is scheduled for approval on June 1, 1984.



**D. C. COOK NUCLEAR PLANT**  
**R P I P ACTIVITY C-6**  
**COMMITMENT LIST**

**1984**

J	F	M	A	M	J	J	A	S	O	N	D
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**REVISE G.P. 2.2 TO REFLECT ENHANCEMENTS  
OF ACTION ITEM TRACKING SYSTEM**

## C.7 INDEPENDENT VERIFICATION PROGRAM, IVP

### SCOPE OF ACTIVITY

The objective of the independent verification program is to ensure that equipment is removed and returned to service without jeopardizing the safety of the plant.

Various methods have been used to ensure that correct actions are taken on the correct components, during the removal and return to service of equipment. Initially, the area of interest was the tag-out of Technical Specification equipment. More recently, the area of interest has been expanded to include equipment that is "important to safety" and balance of Plant equipment for which incorrect operation could jeopardize power generation. Initially, a two-person team ("reader/doer-verifier") was employed to ensure proper location of equipment. Credit was taken for the second person as the "verifier" of proper operation on the correct component. This process has been variously referred to as "double," "independent," and "double-independent" verification.

The above approach does not represent truly independent verification and has not proved adequate to ensure detection of errors in the removal or return to service of equipment.

Effective February 1, 1984, independent verification of the removal and return to service of equipment shall be performed by persons acting independently of those performing the removal or return to service action. If it is necessary to send two-person teams to perform the initial action (for reasons of safety, component location, etc.), the independent verification action shall be performed by a person or persons acting independently of that team. Additionally, where practical, this independent verification is to be performed using an independent means (e.g. redundant indication, operability test observations, etc.) from those used by the initial person(s). Interim guidance on these points has been issued, pending incorporation into individual procedures, by the Technical and Operations Departments.

The current independent verification is applicable to the following activities:

- Removal and return to service of Tech. Spec. equipment/systems.
- Removal and return to service of equipment/systems "Important to Safety." The following guidance is available in NRC correspondence to define the scope of this term:

Emergency systems that are required to prevent or mitigate a LOCA are "Safety-related" and (a subset of) "Important to Safety." In general, equipment required to be operable by the Technical Specifications is "Important



### C.7 (continued)

to Safety." Equipment described in the FSAR and credited with controlling the reactor, preventing or mitigating an accident or transient considered in the FSAR, is "Important to Safety." Equipment that the licensee has committed to by letter to the NRC to install, such as TMI Action item equipment, is "Important to Safety."

- Removal and return to service of equipment which could, directly or indirectly, cause a turbine, generator or reactor trip. This equipment must be defined in each department having authority to manipulate operational equipment/components.

The following exceptions are made to the current Independent Verification Program:

- Actions (except Clearance Permit tagging and return-to-service lineups) performed in the Control Rooms by the Control Room Operators.
- Actions taken in response to emergency conditions or in response to significant operating transients. However, appropriate verifications must be performed once conditions are stabilized.
- Routine operation of fire protection equipment (opening fire doors, isolation of CO<sub>2</sub> fire suppression system, etc.) for personnel access. These systems/equipment shall be controlled as delineated in the governing PMI.
- During outages, when a Unit is in Mode 5 or 6 and secondary Plant non-Tech. Spec. systems have been properly tagged out for maintenance activities. Independent verification of activities on these systems is not required if a full system lineup is scheduled to be conducted prior to returning the Unit to service.



## C.8 PROBLEM ALARMS IN CONTROL ROOM

### SCOPE OF ACTIVITY

The purpose of this activity is to minimize the number of control room annunciators/alarms that are problems. A problem alarm is defined as being lighted or in an alarmed condition during power operation.

There are approximately 3600 alarms in the two control rooms. In the February 7, 1983 submittal 214 problem alarms had been identified. To date, 262 have been identified as problems. Approximately 45 problem alarms have been resolved. The Mechanical Engineering review on 64 other alarms has been completed. The schedule for the remaining 153 alarms is as follows:

- The Mechanical engineering review for all 153 alarms is to be completed by April 27, 1984.
- The electrical engineering review will be provided such that it is consistent with a December 7, 1984 design development completion date.
- Design development for resolving all 153 alarms is to be completed by December 7, 1984.
- Design change installation (implementation) is to be completed by the end of the Unit 1 refueling outage (approximately May 1, 1985).



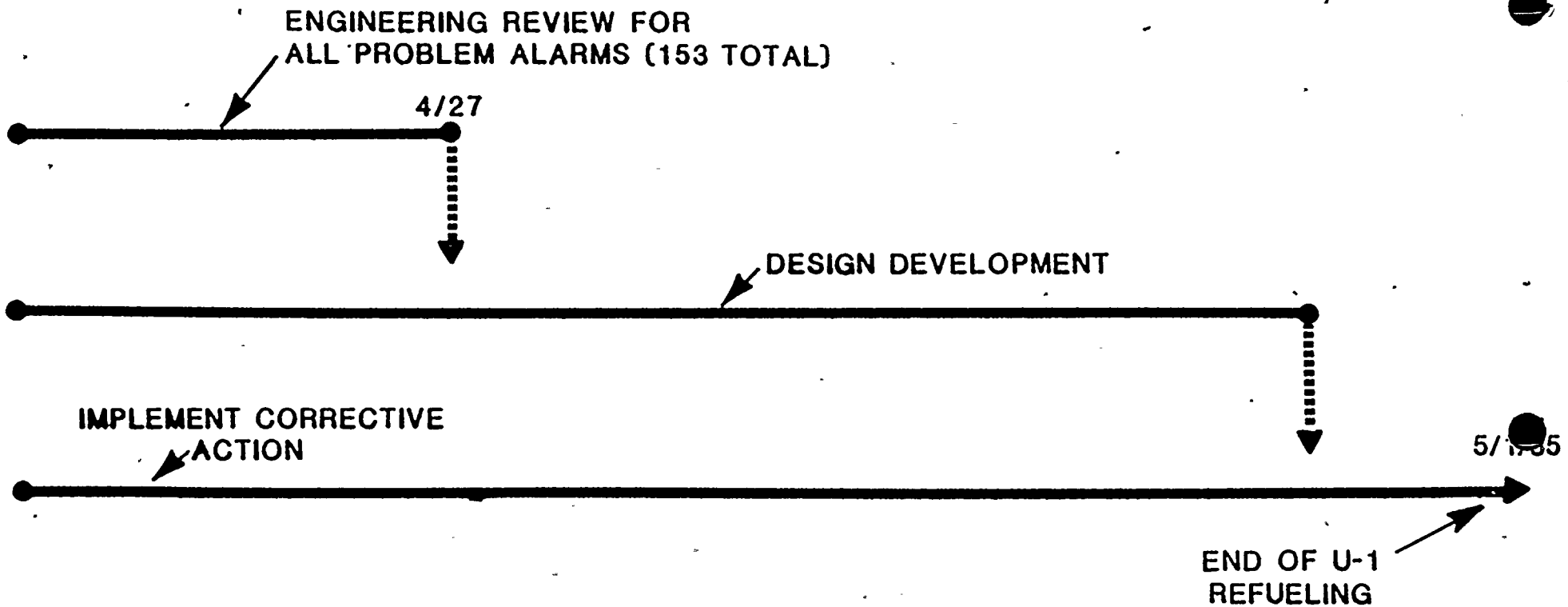
# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-8

### PROBLEM ALARMS IN CONTROL ROOM

1984

J	F	M	A	M	J	J	A	S	O	N	D
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NOTE: DESIGN COMPLETE FOR 24 ALARMS  
AS OF 1-20-84



## C.9 COMPUTERIZED SURVEILLANCE PROGRAM

### SCOPE OF ACTIVITY

A computer program has been developed to reduce the possibility of not conducting required surveillances. As indicated in the February 7, 1983 submittal, all Technical Specification surveillance schedules have been entered into the computer data base. To ensure the data base has been maintained, an audit will be performed to confirm the data base is complete with correct surveillance intervals. This audit is scheduled to be performed in June, 1984.

A measure has been established to control adjustments to the data base when surveillance requirements change. However, the measure is at the discretion of each Plant department head. The measure is accomplished by reviewing each Technical Specification amendment prior to implementation. This is now possible because a grace period is allowed upon receiving an amendment before it becomes effective. A Plant Manager's directive will be issued by February 10, 1984, which will ensure uniform implementation of amendments, including computer data base updating by all Cook Plant departments.

Certain enhancements have been requested by Plant personnel for the computer program. The enhancements are needed to make the program an on-line, interactive tool for scheduling and ensuring completion of surveillance tests before they are overdue. The reasons for the requested enhancements are:

- (1) the program is not "friendly" to the ultimate end user, who is the front-line supervisor on the back shift.
- (2) the reliability of the main (Canton, Ohio) computer complex and communication lines do not allow reliable availability of the system.
- (3) the "scheduling" capability of the system is poor.
- (4) the system is too "inflexible" to allow for non-routine surveillances.

A meeting between Plant and Corporate personnel is scheduled for February 8 and 9, 1984, to discuss the desired enhancements.

We have confirmed that the computer program provides the capability for entering In-Service testing requirements into the data base.

The scheduled surveillances will continue to be controlled manually until the computer program has proven to be satisfactory.

# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-9

### COMPUTERIZED TECH. SPEC. SURVEILLANCE PROGRAM

1984

J	F	M	A	M	J	J	A	S	O	N	D
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REQUIRED ENHANCEMENTS TO COMPUTER  
PROGRAM IDENTIFIED

2-8  
2/9

2 DAY MEETING TO DISCUSS ENHANCEMENTS,  
AND TO DEFINE SCHEDULES FOR:

1. IMPLEMENTATION OF ENHANCEMENTS
2. IST REQUIREMENT INPUT TO DATA BASE
3. TRAINING

## C.10 QA/QC ORGANIZATIONS AND FUNCTIONS

### SCOPE OF ACTIVITY

On July 1, 1983, the Quality Assurance (QA) Audit Section of the Plant QA Department was transferred to the AEPSC QA Department. This Audit Section continues to reside at the D. C. Cook Plant site under the direction of an AEPSC QA Supervisor. The QA Supervisor reports solely to the AEPSC Manager of QA. The primary functions and reorganizational status of the site QA Section are discussed in Appendix B, Paragraph 8 to this submittal. Revision of twelve implementing procedures relative to the QA review and audit program remains to be accomplished. The target date to complete the revision activities is June 1, 1984. Attachment C.10 provides the schedule for accomplishing the revision activities.

The Quality Control Department continues to report to the Plant Manager. The reorganizational status of the QC Department is discussed in Appendix B, Paragraph 8 to this submittal. The following staffing, administrative, and functional plans remain to be accomplished:

- Hiring of ten additional QC personnel  
(Reference Appendix C.3, for status and results).
- Four individuals are being reassigned within the plant to the QC staff, effective February 1, 1984.
- PMI drafted to define QC functions, needs approval.
- System training to start by February 15, 1984.
- QC procedure reviews to reflect current QC alignment to start by February 15, 1984. Reviews to be completed by July 11, 1984. Revisions to be completed by December 1, 1985.
- Training program on visual inspection to start by March 1, 1984.
- Design changes to be monitored during upcoming Unit 2 refueling outage.
- Quarterly surveillances of Clearance Permits to start March 31, 1984.
- Weekly unannounced inspections of in-progress Technical Specification surveillance testing in the Operations/Technical Departments to be started by April 1, 1984.
- Review of all Technical and Operations procedures for incorporation of QC hold points will start by July 1, 1984.

Three site contractors' QA manuals are scheduled for approval on March 30, 1984.

ATTACHMENT C.10

SCHEDULE FOR REVISING QA REVIEW AND AUDIT PROCEDURES

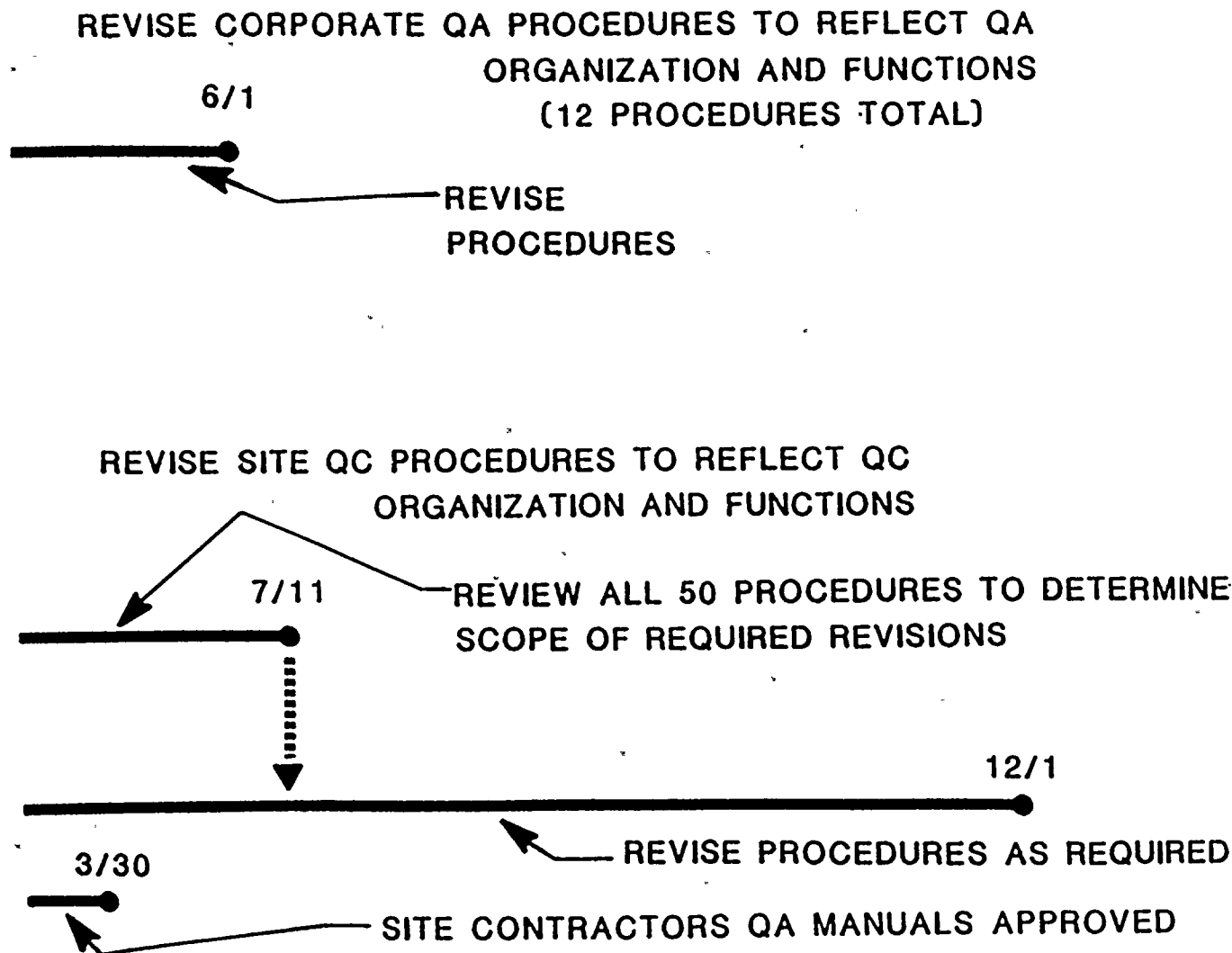
<u>QAP No.</u>	<u>Title</u>	<u>Revision</u>	<u>Due Date</u>
1	AEPSC QA Organization & Responsibilities	2	02-29-84
2	Position Descriptions	2	03-31-84
151	Preparation of QA Organization & Procedures Manual Procedures	1	03-1-84
18	QA Indoctrination and Training	1	03-1-84
19	QA Audits	5	03-1-84
21	Auditor Qualification	3	03-1-84
26	Review of Requests for Change (Prior to Transmittal to Plant from AEPSC & Prior to Plant Closeout)	1	03-1-84
271	Processing/ Verification of NRC Correspondence	1	04-01-84
28	Biennial Review of AEPSC General Procedures & QA O&P Manual Procedures	1	03-1-84
34	Review of Purchase Orders	1	02-28-84
38	Quality Related Problem Escalation	1	03-1-84
40	Review of Changes to CFR, Standards, NRC Reg. Guides	1	06-01-84

# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-10

### QA / QC ORGANIZATIONS AND FUNCTIONS

1984												1985												1986											
J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D



# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-11

### CONFIRMATORY ACTION LETTER RESPONSE SCHEDULES

1984

J	F	M	A	M	J	J	A	S	O	N	D
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REVISE NSDRC/SUB-COMMITTEE PROCEDURES

3/31

NOTE:

NSDRC & SUB-COMM.CHARTERS CMPLT.  
NSDRC PROCEDURES CMPLT.  
AUDIT SUB-COMM.PROCEDURE CMPLT.

REVIEW LICENSES TO INSURE THAT LICENSE CONDITIONS ARE AUDITED (AEPSC-QA)

4/15 5/1

REPORT TO NRC

NSDRC AUDIT SUB-COMM. REVIEW PREVIOUS NSDRC AUDIT REPORTS TO EVALUATE EFFECTIVENESS

6/30

CHANGES TO PROCEDURES:

● PNSRC TO IDENT. SAFETY-RELATED PLANT PROCS.

3/1

● NS&L TO IDENT. SAFETY-RELATED G.P.s

3/1

● NSDRC SUB-COMM. ON PROPOSED CHANGES TO REVIEW PNSRC SAFETY-REVIEWS OF PLANT-PROCEDURE CHANGES

12/31

# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-11

### CONFIRMATORY ACTION LETTER RESPONSE SCHEDULES

1984

J	F	M	A	M	J	J	A	S	O	N	D
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#### CHANGES TO PROCEDURES (CONT'D)

- NS&L REVIEW SAFETY-RELATED G.P.s

9/1

#### CHANGES TO EQP'T. OR SYSTEMS

- NSDRG SUB-COMM. ON PROPOSED CHANGES TO REVIEW SAFETY-RELATED RFCs & PMs

12/31

12/31

#### REVIEW OF TESTS & EXPERIMENTS (NSDRG SUB-COMM. ON PCs)

- REVISE PNSRC PROCEDURES TO INCORPORATE REVIEW OF TESTS & EXPERIMENTS

2/15

TO 4/1/85

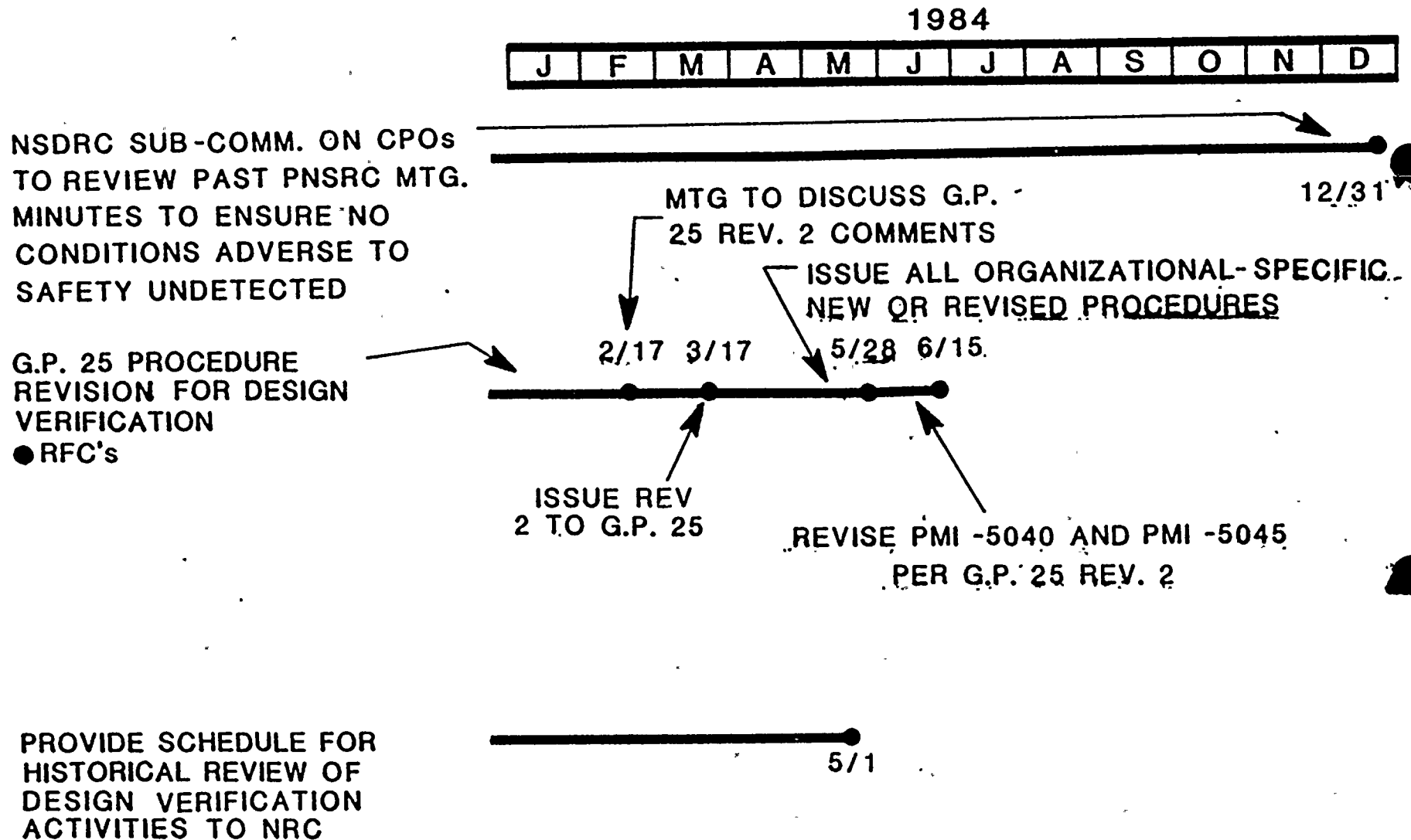
NSDRG SUB-COMM. ON CORP. & PLANT OCCURRENCES (C&POs) REVIEW LERs, COND. RPTs, NON-COMPL. RPTs, INSPECT RPTs, ETC. TO ENSURE NO CONDITIONS ADVERSE TO SAFETY UNDETECTED



# D. C. COOK NUCLEAR PLANT

## R P I P ACTIVITY C-11

### CONFIRMATORY ACTION LETTER RESPONSE SCHEDULES



1954  
10-24