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 MURLEY, T. E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Responds to ltr re importance of NRC Info Notice 91-22.
 Highlights steps taken to ensure personnel maintain high
 level of awareness of potential for causes of shutdown risks
 described in notice.

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Dr. T. E. Murley
Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

50-315/316

May 3, 1991

Dear Dr. Murley:

E. E. Fitzpatrick
Vice President
Nuclear Operations
614 223 2010

In response to your letter regarding the importance of NRC Information Notice 91-22, I would like to highlight the steps taken to ensure that Cook Nuclear Plant personnel maintain a high level of awareness of the potential for and causes of the shutdown risks described in the notice. I, too, am concerned about the types of events described in the notice and have issued an internal memorandum that emphasizes the importance of this issue.

Plant management also recognizes the importance of shutdown risk assessment. While measures have been taken to reduce shutdown risks in the past (unloading the core for the duration of the outage, for example), we have recently instituted formalized practices as a result of our review of the information notice and in preparation for a recent short, planned outage. These efforts include measures to ensure that plant personnel remain aware of the potential for events to occur during outage conditions and precautions to ensure that the probability of such events is significantly reduced.

Because the recent short outage dealt with the inspection and minor repair of a main transformer, we were particularly interested in maintaining high awareness of the potential for loss of power. The Cook Nuclear Plant outage management team was briefed regarding events involving loss of AC power while shutdown and was given copies of pertinent notices and event reports from NRC and INPO. The safety and assessment department, as a result of their review of NRC information notices and INPO significant event reports, published lists detailing AC power supplies and available backup power supplies required by the technical specifications, the technical specifications impact on expected system outages, and recent industry events involving loss of AC power while shutdown. Additionally, a shutdown risk profile was published and reviewed daily. A pictorial representation of the status of critical equipment was provided and discussed each morning during the outage to reinforce further its importance to safety. An example of the pictorial representation is attached.

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1. The first part of the report is a general
introduction to the subject of the study.

2. The second part of the report is a
description of the methods used in the study.

3. The third part of the report is a description of the results of the study.

4. The fourth part of the report is a discussion of the results of the study.
The discussion is divided into two main parts. The first part is a discussion of the
results of the study. The second part is a discussion of the implications of the results of the study.

5. The fifth part of the report is a conclusion of the study.

Dr. T. E. Murley
Page 2
May 3, 1991

In addition, the plant manager issued directives requiring plant manager approval of all non-routine activities within the switchyard and requiring that an additional power supply above those required by the technical specifications be maintained throughout the outage. During the outage, the roadway leading to the preferred off site power supply transformers was closed and the transformer area was cordoned off to limit access. Concrete barriers were installed to protect reserve transformers from inadvertent impact and a designated spotter was required during any crane movement in the transformer area. The outage management team periodically inspected the transformer and diesel generator air intake areas for safety hazards, loose debris, and fire hazards. As an added precaution, prior to removing a diesel generator train from service for maintenance, the opposite train's diesel generator was run to verify its operability. This verification was in addition to any technical specification requirements.

A Cook Nuclear Plant shutdown issues task force has been convened to examine issues affecting plant safety during shutdown. Areas such as reactivity control, decay heat removal, and reactor vessel protection are being examined to determine the adequacy of our current practices and to suggest improvements. The task force is represented by personnel from a variety of departments including operations, outage planning, maintenance, nuclear safety and licensing, and shift technical advisors. In addition, the plant manager is a member of the NUMARC shutdown risk assessment team.

We intend to continue the practices described above and to implement, through formal procedure, the recommendations resulting from the plant shutdown issues task force. The result of these controls is that the issues surrounding non-routine plant configurations remain in the foreground during plant outages. It is our intent to, and our belief that these measures will, prevent the types of events described in Information Notice 91-22 from occurring at Cook Nuclear Plant.

If you require additional information regarding Cook Nuclear Plant practices, please contact me.

Sincerely,



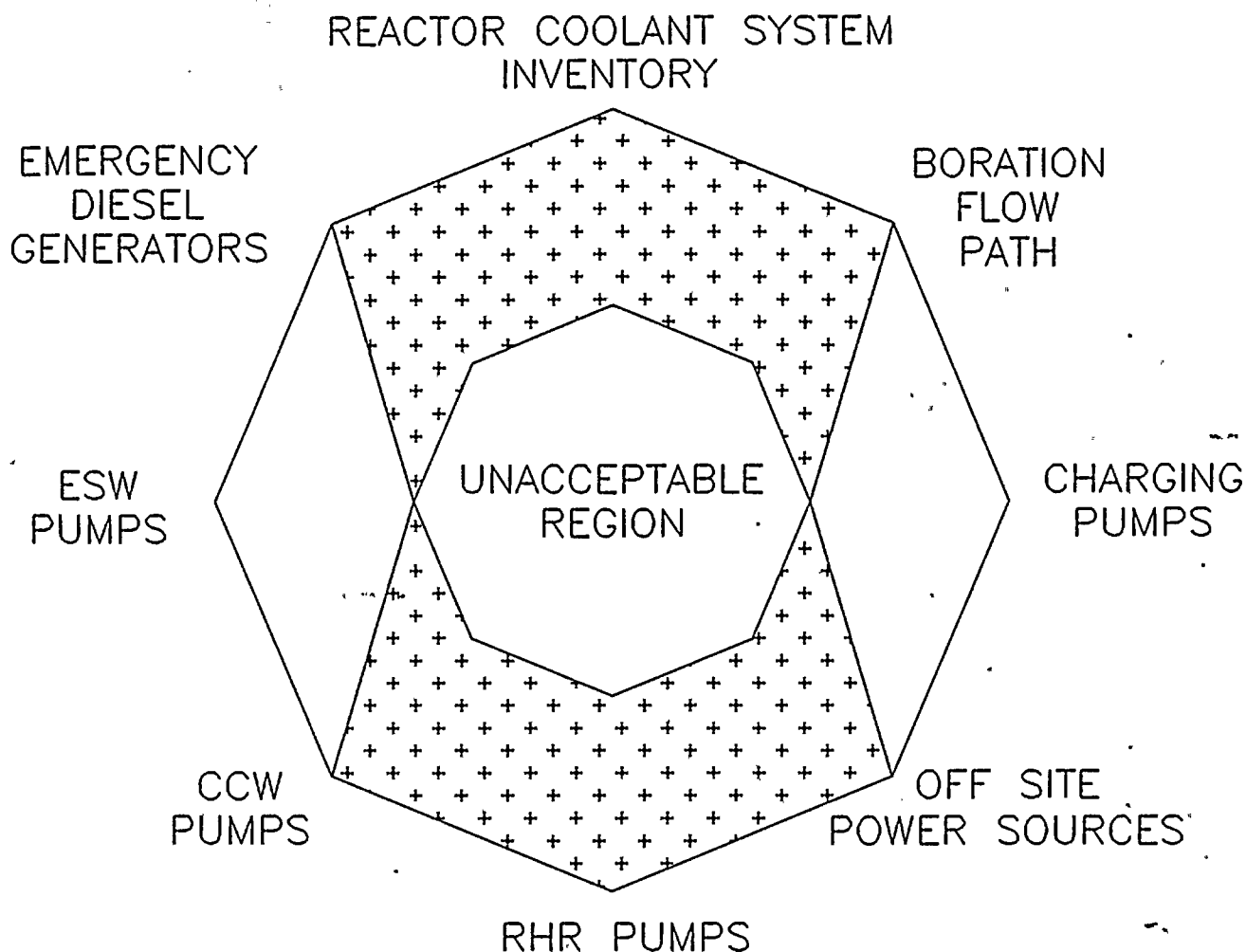
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Attachment



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D. C. COOK NUCLEAR PLANT CRITICAL PARAMETERS

4/25/91



<u>Parameter (Acceptable Range)</u>	<u>No.</u>	<u>Comments</u>
RCS Inventory (621-614 ft)	>621 ft	PZR >17% level
Boration Flow Paths Avail (1-2)	2	
Charging Pumps Avail (1-2)	1	WEST Pump Out of Service
Off Site Power Sources (1-2)	2	
RHR Pumps Operable (1-2)	2	
CCW Pumps Operable (1-2)	2	
ESW Pumps Operable (1-2)	1	EAST Pump Out of Service
Diesel Generators Operable (1-2)	2	

STATUS OF CHANGES:

West CCP has been Removed from Service to Leak Test CS-299W



10/10/10