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SUBJECT: Responds to NRC 970327 ltr re violations noted in insp repts
50-315/97-02 & 50-316/97-02. Corrective actions: revised
procedures re in-hand procedure implementation & sized new
slings to accommodate full weight for lifting canisters.

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Indiana Michigan
Power Company
500 Circle Drive
Buchanan, MI 49107 1395



April 28, 1997

AEP:NRC:1260A
10 CFR 2.201

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
NRC INSPECTION REPORTS NO. 50-315/97002 (DRP)
AND 50-316/97002 (DRP) REPLY TO NOTICE OF VIOLATION

This letter is in response to a letter from J. L. Caldwell, dated March 27, 1997, that transmitted a notice of violation and a notice of deviation to Indiana Michigan Power Company. The notice of violation contained a total of seven violations of NRC requirements identified during an NRC inspection conducted from January 6, 1997, through February 15, 1997. Our response to these violations is provided in attachment 1. The violations pertain to procedures and the use of procedures at Cook Nuclear Plant.

The notice of deviation is a result of a commitment made by Indiana Michigan Power Company for the control of heavy loads. Our written response to this item is provided in attachment 2.

Mr. Caldwell also expressed concern with procedural adherence and inadequate procedures at Cook Nuclear Plant. Attachment 3 of this letter provides information on corrective actions related to procedural adherence and procedural adequacy issues at our plant.

Sincerely,

E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 28th DAY OF APRIL, 1997

Linda L. Boelcke
Notary Public

My Commission Expires 1-21-2001

vlb

Attachments

LINDA L. BOELCKE
Notary Public, Berrien County, MI
My Commission Expires January 21 2001

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U. S. Nuclear Regulatory Commission
Page 2

ABP:NRC:1260A

c: A. A. Blind
A. B. Beach
MDEQ - DW & RPD
NRC Resident Inspector
J. R. Padgett



ATTACHMENT 1 TO AEP:NRC:1260A

REPLY TO NOTICE OF VIOLATION:
NRC INSPECTION REPORT NOS. 50-315/97002 (DRP)
AND 50-316/97002 (DRP)



On February 15, 1997, the NRC completed an inspection of Cook Nuclear Plant units 1 and 2 reactor facilities. Seven violations of NRC requirements were identified during this inspection. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions" (60 FR 34381, dated June 30, 1995), the violations and our responses are provided below.

NRC Violation I

"D. C. Cook Plant Technical Specification 6.8.1 stated, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide (RG) 1.33, Rev 2, February 1978.

Regulatory Guide 1.33, Appendix A, paragraph 1.d, required that a procedure be written to establish the controls for procedure adherence. Plant Manager's Instruction (PMI) 2011, "Procedure Use and Adherence," was written in accordance with RG 1.33.

- a) PMI-2011 Section 3.1.1 that established in-hand procedure requirements (indicated by a "***" in the procedure number), stated that technical documents which were intended to be used by qualified individuals during the performance of an activity were required to be designated "in-hand." In-hand procedures were required to be at the job-site.

Contrary to the above,

- i) The inspectors identified that on January 28, 1997, licensee personnel performed new fuel unloading work for unit 1 without using procedure **12MHP4050.FDF.001, "Receipt and Storage of New Fuel Assembly Shipping Containers," in-hand.
- ii) The inspectors identified that on January 28, 1997, licensee personnel performed new fuel unloading work for unit 1 without using procedure **12MHP4050.FDF.002, "Unloading of New Fuel Assemblies from Shipping Containers," in-hand.

This is a Severity Level IV violation.

- b) PMI-2011, Section 3.1.1 required, in part, that in-hand procedures (indicated by a "***" in the procedure number) shall be performed as follows: read the step, perform the step, document completion of the step, and proceed to the next step.

Contrary to the above, the inspectors identified that written procedures were not adequately implemented in that on January 25, 1997, licensee personnel performed **12MHP4050.FDF.005, "Handling of New Fuel Assemblies for Inspections and Associated Work," for twelve fuel assemblies without replacing the floor plug in the new fuel storage vault after seating each fuel assembly as required by the procedure.

This is a Severity Level IV violation."



Response to NRC Violation I

1. Admission or Denial of the Violation

Indiana Michigan Power admits to violation I as cited in the NRC notice of violation.

2. Reasons for the Violation

Licensee personnel did not adequately implement "in-hand" procedures. The procedures were either not open at the job site, or the procedures were there, but not being implemented in a step-by-step manner.

Standards and expectations for performance of work to an in-hand procedure were too low in these cases. Personnel believed that the "intent" of the procedures was being met and that this was acceptable for the work being performed.

Corrective action was taken to ensure the new fuel was moved using the procedures "in-hand" and in a step-by-step manner. It was then identified that the procedures, as written, could not effectively be used to unload and move multiple fuel assemblies.

3. Corrective Action Taken and Results Achieved

On January 28, 1997, the work activities associated with fuel movement were halted twice. On the first occasion, the importance of in-hand procedure implementation was reinforced with the fuel handling crew and the first line supervisor. On the second occasion, this principle was discussed again, very specifically, including explicit management expectations for how "in-hand" was to be implemented.

The work was completed with increased supervisory oversight. One additional person was added to the work crew, dedicated to the task of reading the procedures and assuring all steps were strictly followed.

Procedure changes were made using approved change mechanisms to revise the sequence in which certain steps were performed.

4. Corrective Actions Taken to Avoid Further Violations

Maintenance work activities were essentially halted while expectations for in-hand procedure use were communicated to maintenance department personnel.

5. Date When Full Compliance Was Achieved

Full compliance was achieved on January 29, 1997, when the necessary procedure changes were completed.

NRC Violation II

"D. C. Cook Plant Technical Specification 6.8.1 stated, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide (RG) 1.33, Rev 2, February 1978.

RG 1.33, Appendix A, paragraph 9.e, required that procedures be written to control maintenance, repair, replacement and modification work.

Maintenance Head Instruction (MHI) 4053, "Control of Heavy Loads," was written in accordance with RG 1.33. Section 3.6, "Lifting Devices (Slings)," step 3.6.2 required, in part, that the guidelines set forth in ANSI B30.9-1971, "Slings," be followed.

ANSI B30.9-1971, "Slings," Section 9-1.9, "Safe Operating Practices," step 9-1.9.1b required that the sling shall have suitable characteristics and rated capacity for the load and environment.

Contrary to the above, the inspectors identified that written procedures were not adequately implemented in that on February 3, 1997, licensee personnel lifted a load of new fuel assemblies weighing approximately 6,325 pounds using a lifting sling that was not rated for the load. This lifting sling was rated for 6,000 pounds and was previously used at least 12 times between January 25, 1997, and February 3, 1997, for identical lifts.

This is a Severity Level IV violation."

Response to NRC Violation II

1. Admission or Denial of the Violation

Indiana Michigan Power admits to violation II as cited in the NRC notice of violation.

2. Reasons for the Violation

The lifting sling was purchased many years ago, to be used specifically to upright fuel assemblies out of the shipping canister. The process used to upright a pair of fuel assemblies out of the canister does not involve lifting the shipping canister off the floor. However, this is recognized as a possible occurrence, and, therefore, we failed to adequately consider the maximum load the lifting sling may be subjected to and size it accordingly.

The lifting sling has not been used to lift and move loaded fuel canisters. The need to upgrade this lifting sling to meet NUREG-0612 commitments was not considered because the sling is not intended to "lift" a heavy load. There are other appropriately sized slings that are used to lift loaded fuel canisters when they are moved into position for unloading.

3. Corrective Action Taken and Results Achieved

The fuel assemblies were placed in a safe configuration and the lifting sling was removed. Appropriately sized slings were obtained from the tool crib and used to upright fuel assemblies out of the shipping canisters.

4. Corrective Actions Taken to Avoid Further Violations

The weight involved in lifting one end of the canister is not the full weight of a loaded shipping canister. However, we have sized a new sling to accommodate this full weight for conservatism, because inadvertently lifting the canister is a potential consequence when uprighting the fuel assemblies.

New rigging will be purchased, or existing rigging will be designated specifically for this activity, by August 5, 1997.

5. Date When Full Compliance Was Achieved

Full compliance was achieved on February 3, 1997, when the old lifting sling was removed from service, and a sling sized to lift ten thousand pounds was obtained and used to complete the new fuel unloading activities.

NRC Violation III

"D. C. Cook Plant Technical Specification 6.8.1 stated, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide (RG) 1.33, Rev 2, February 1978.

RG 1.33, Appendix A, paragraph 9.e, required that procedures be written to control maintenance, repair, replacement and modification work.

- a) Plant Manager's Instruction (PMI) 2220, "Foreign Material Exclusion," was written in accordance with RG 1.33. Section 6.0, "Responsibilities," step 6.2, stated, "Line supervision is responsible for monitoring work and ensuring FME [Foreign Material Exclusion] controls are adequate and being implemented."

Contrary to the above, on January 28, 1997, NRC inspectors identified that procedures were not adequately implemented in that foreign material was found on the ledge of the open new fuel storage vault. The mechanical maintenance supervisor assigned to new fuel receipt did not monitor the work, and failed to ensure that adequate FME controls were being implemented.

This is a Severity Level IV violation.

- b) Plant Manager's Instruction (PMI) 2220, "Foreign Material Exclusion," was written in accordance with RG 1.33. Plant Manager's Procedure (PMP) 12 PMP 2220.001.001 was written to implement PMI 2220. Step 5.2.5 required, "[W]hile working within the FMEZ [Foreign Material Exclusion Zone], 'Clean-As-You-Go' work practice shall be maintained to minimize the potential for introduction of foreign materials into any equipment or system."



Contrary to the above, on January 28, 1997, NRC inspectors identified that procedures were not adequately implemented in that foreign material was found on the ledge of the open new fuel storage vault (NFSV). The work crew did not clean the ledge of the NFSV after removing the shield plug, which created the potential for the introduction of foreign materials into the NFSV.

This is a Severity Level IV violation.

- c) Plant Manager's Instruction (PMI) 2220, "Foreign Material Exclusion," was written in accordance with RG 1.33. Plant Manager's Procedure (PMP) 12 PMP 2220.001.001 was written to implement PMI 2220. Step 5.1.3 required, "If evaluation (performed in step 5.1.1 of the procedure) results in an FMEZ [Foreign Material Exclusion Zone] designation of FMEZ-1 or FMEZ-2, then the work group supervisor shall complete a Foreign Material Exclusion Requirement/Work Practices Determination, Attachment 2, to determine appropriate FME requirements, work practices, and post-job inspections." Step 5.1.4 required, "A copy of the completed Attachment 2 should be included in the work package and should be used in the pre-job brief."

Contrary to the above, Attachment 2 to 12 PMP 2220.001.001 was not completed for work performed in an FMEZ on January 28, 1997, was not included in the work package and was not used in the pre-job brief.

This is a Severity Level IV violation."

Response to NRC Violation III

1. Admission or Denial of the Violation

Indiana Michigan Power admits to violation III as cited in the NRC notice of violation.

2. Reasons for the Violation

The requirements of the foreign material exclusion (FME) program were not adequately considered in the performance of unloading new fuel. The overall expectations for implementation of FME during this activity were too low. Supervisory monitoring and coaching during the performance of this work were also weak.

3. Corrective Action Taken and Results Achieved

The ledges of the new fuel vault openings were cleaned.

Prior to work resuming on new fuel unloading, a pre-job brief was conducted with the crew that included foreign material control. A foreign material exclusion requirement/work practices determination, attachment 2 of PMP-2220.001.001, was not backfitted into the job order package. However, the purpose of attachment 2, determination of FME controls, was accomplished in the job briefing and subsequent FME oversight during the remainder of the activity. A separate crew member was assigned oversight responsibility during the remainder of



the work to watch for attention to FME practices and principles.

The importance of supervisory oversight and expectations was discussed with the first line supervisor. The responsible supervisor was available at the job site full time after new fuel movement resumed.

4. Corrective Actions Taken to Avoid Further Violations

The applicable procedure was revised on January 31, 1997, to include instructions for cleaning the ledge when the floor plug is removed and to erect barriers around the floor opening after the floor plug is removed. The procedure was also revised to delineate the responsibilities of maintenance personnel and maintenance supervisors assigned to new fuel movement. This includes responsibility for adhering to FME controls.

The first line supervisor involved during the periods of noncompliance has been placed on an individual performance improvement plan.

5. Date When Full Compliance Was Achieved

Full compliance was achieved on January 29, 1997, when the ledges of the new fuel vault openings were cleaned, and work was resumed to complete unloading of new fuel with full time supervisory attention and strict adherence to FME controls determined necessary for the job.

NRC Violation IV

"10 CFR 50, Appendix B, Criterion V, stated that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances.

Contrary to the above, fuel handling procedures **12MHP4050.FDF.001, "Receipt and Storage of New Fuel Shipping Containers," **12MHP4050.FDF.002, "Unloading of New Fuel Assemblies From Shipping Containers," **12MHP4050.FDF.005, "Handling of New Fuel Assemblies for Inspections and Associated Work," were inadequate in that the procedures had errors in work step sequencing; the procedures lacked foreign material exclusion practices; and the procedures contained no detail on rigging requirements and control of heavy loads requirements.

This is a Severity Level IV violation."

Response to NRC Violation IV

1. Admission or Denial of the Violation

Indiana Michigan Power admits to violation IV as cited in the NRC notice of violation.



2. Reasons for the Violation

Standards and expectations for performance of work to an in-hand procedure were too low in this case. Personnel believed the "intent" of the procedure was being met and that this was acceptable for the work being performed. Previous use and reviews of the procedures failed to identify cases where the procedure could not be worked in a step-by-step manner.

It has not been a practice at Cook Nuclear Plant to include specific FME instructions and requirements in each individual procedure. Instead, we have a controlling FME program and procedures designed to ensure the appropriate controls are implemented on a job by job basis. In this instance, the planning process and pre-job reviews failed to identify this activity as a source of foreign material relative to nuclear fuel.

It has also not been our standard practice to include specific rigging requirements in individual procedures. One controlling program, combining appropriate guidance and worker training, has been used to determine the appropriate requirements for moving heavy loads, crane use, rigging, etc. The lifting sling used to upright fuel assemblies in the shipping container was dedicated to the activity, and, therefore, no one went to the rigging portion of the program to identify rigging requirements. The dedicated rigging was inappropriately sized, as discussed previously, based on a conservative determination of the maximum possible load which may be lifted.

3. Corrective Action Taken and Results Achieved

Fuel movement was halted until a review of the remaining procedure was completed, procedure changes were made, and the procedure was determined to be workable. After work was resumed, additional deficiencies were identified. These were corrected immediately using approved procedure change mechanisms. A dedicated procedure reader was assigned to the completion of new fuel movement to provide an assessment of whether or not procedure requirements for "***" procedure usage were being achieved.

The applicable procedure was revised to include criteria for cleaning the ledge when the floor plug is removed, and to erect barriers around the floor opening after the floor plug is removed.

Another procedure was revised to provide approximate weights of all of the components being handled. This provides information that may be used to determine the rigging requirements for combinations of items to be moved. Further, specific guidance is provided for the selection of rigging for the various types of lifts made during movement and storage of new fuel.

4. Corrective Actions Taken to Avoid Further Violations

Procedure deficiencies related to performance in a step-by-step manner, identified during new fuel movement, were corrected on January 29, 1997.

The procedures that are identified in the notice of violation were revised to include FME controls and specific guidance for rigging arrangements. These revisions were completed on January 31, 1997, and February 8, 1997, respectively.

As an organization, we developed programs specifically designed to address FME concerns and heavy load lifting concerns. It was determined these program controls are more effective than adding this material to each individual procedure where it might be applicable. At this time, it is believed that increased management attention and support for strict and diligent use of these program controls will be sufficient to avoid further violations.

5. Date When Full Compliance Was Achieved

Full compliance was achieved on January 29, 1997, when the new fuel procedures were corrected to be used in a step-by-step manner. Procedure enhancements were completed on February 8, 1997, to include FME and heavy load programmatic controls.



ATTACHMENT 2 TO AEP:NRC:1260A

REPLY TO NOTICE OF DEVIATION:
NRC INSPECTION REPORT NOS. 50-315/97002 (DRP)
AND 50-316/97002 (DRP)



During an NRC inspection conducted January 5, 1997 through February 15, 1997, a deviation of your [licensee] actions committed to in response to NUREG-0612, "Control of Heavy Loads," was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the deviation is listed below:

NRC Deviation

"NUREG-0612, Section 2.4-2.b(3), requested information concerning "Where load/target combinations are eliminated on the basis of other, site-specific considerations...."

Licensee letter AEP:NRC:0514F, dated December 3, 1982, which responded to section 2.4-2.b(3), among others, stated in part, "All loads of five tons or less listed [in] Table 2.1.3.C.1 of our letter No. AEP:NRC:0514C (Hereby resubmitted as Attachment 1 No. 1 to this letter) will be moved as close to the floor as practical, but in no case higher than 7 feet above the floor." Table 2.1.3.C.1, item A5, listed new fuel shipping containers with [fuel] assembly[ies], as a load handled by the aux crane.

Contrary to the above, on February 3, 1997, the inspectors identified that the licensee moved new fuel shipping containers, containing new fuel assemblies, and weighing approximately four tons, higher than 7 feet above the floor when moving the containers to a location to be unloaded."

Response to NRC Deviation

1. Reasons for the Deviation

In a June 28, 1985, letter to licensees, the NRC stated that implementation of items included in NUREG-0612, phase II submittals, was determined to be optional. Implementation of items that the licensees considered appropriate was encouraged, but not required. The subject commitment had been implemented at Cook Nuclear Plant in 1981. However, the applicable procedures were periodically revised, changing our implementation of this item without considering the original commitment.

2. Corrective Action Taken and Results Achieved

Immediate action was to stop movement of new fuel and any other loads that were applicable to the original commitment. Loads handled by the auxiliary building crane were limited to less than 2500 lbs., unless job specific reviews were conducted and the lift was approved by the maintenance superintendent.

The original commitment was reviewed and was changed to state:

"All loads of 5 tons or less, including those listed in Table 2.1.3.c.1 of our letter AEP:NRC:0514C, will be moved as close to the floor as practical, but in no case higher than 7 feet above the floor. Any exceptions to this practice, to clear obstructions, will be limited

to a lift elevation of 14 feet from the floor. Slings selected for these loads will have a minimum safety factor of 6."

Appropriate reviews of this commitment change conclude that it preserves the intent of the original commitment while providing the flexibility to assess lifting requirements based on the load weight, and not on the noun description of the load. The procedure was revised on February 27, 1997, to reflect the new version of the commitment.

3. Corrective Actions Taken to Avoid Further Deviations

As discussed above, the criteria for handling loads weighing less than five tons were clarified, and maintenance procedure **12MHP5021.001.036 was revised to include these criteria.

Crane operator refresher training was conducted to highlight the intent of NUREG-0612 and to address the procedure changes.

A self-assessment of the heavy loads program was conducted in late 1996. The results of that self assessment included a recommendation to consolidate the heavy loads program requirements, including all NUREG-0612 commitments, into a single document so that crane operators and lead men have the appropriate instructions needed to meet the commitments. This recommendation is being implemented, and the document will be completed by September 15, 1997.

Another assessment was performed in February of this year, as a result of the finding in this notice of deviation. The 1997 effort was directed at comparing documentation to actual field practices. All phase I commitments were reviewed. Phase II commitments were reviewed, and several new commitments from phase II were identified as appropriate for implementation. This list of commitments will be reflected in the heavy loads document discussed above. The assessment assured that all commitments were appropriately met in procedures. Procedures were updated prior to the resumption of work involving movement of heavy loads.

4. Date When Corrective Actions were Complete

Corrective action was completed on February 27, 1997, when the procedure was revised to include the requirements of the revised commitment.

ATTACHMENT 3 TO AEP:NRC:1260A

CORRECTIVE ACTIONS TAKEN TO ADDRESS PROCEDURAL ADHERENCE
AND PROCEDURAL ADEQUACY

In the letter transmitting inspection report 97002, Region III expressed concern with procedural adherence and procedure problems at Cook Nuclear Plant. We have been asked to address any broad corrective actions we have taken, or will take, in addressing procedural adherence and procedural adequacy issues at the plant.

Background

The Cook Nuclear Plant organization has been concentrating on procedure adherence and procedural adequacy for several years. Indications were clear from our own performance assessments this was an issue requiring increased management attention.

In 1995, a violation was cited by the NRC resident inspector for three clear instances of failure to follow procedures. A management and oversight risk tree analysis was performed to determine the contributing causes. One conclusion was a weakness in the leadership governing the processes which directly impact procedure adherence.

As a result, there was a concerted effort in 1996 to raise standards and general plant awareness of the critical nature of strict procedural adherence and adequacy. Plant wide "time outs" were held that stressed the necessity for strict adherence and self-checking. Management expectations of strict adherence were clearly communicated. This effort had an impact, as measured by distinct repercussions in other activities, such as work stoppages and more frequent procedure changes.

For example, the operations department concentration on strict adherence and communications standards manifested itself as additional time required to complete certain actions in the EOPs, resulting in the need to redesign the step sequences. Maintenance and engineering departments' emphasis on strict procedure compliance has resulted in additional time taken to complete refueling outage activities, in order to correct deficiencies identified in procedures prior to allowing the work to proceed.

Performance assessments have documented an increased number of procedure change sheets being written and greater activity at the worker level to correct procedures. The percentage of condition reports related to procedure adherence has risen in each of the last four months, indicating an increased awareness for identifying compliance issues.

Despite the clear progress, our performance assurance organization has concluded there is a need to continue to improve performance to meet our current high standards.

Raising the Performance Level

Our next step, in response to our own self assessments and regulatory performance, will lead our organizational culture to even stronger emphasis on consistent procedure adherence and improvement. We acknowledge the need for a higher threshold of accuracy and diligence in the quality of our procedures and the standards for using them.

This will be our focus issue in the coming months. A group-wide "time out" for the entire AEP nuclear generation group (AEPNGG) will be held in May 1997, to launch this period of high visibility

management focus on procedure adherence. Additional "time outs" will be held during this time to maintain emphasis and review effectiveness.

The leadership of AEPNGG understands this culture change must be achieved consistently throughout our organization. This will involve a concerted effort and sustained attention beyond the next few months or the next year.

Improving the Tools

An extensive effort is under way in the operations department to upgrade operating procedures. A prioritized plan has been developed by operations management. The resources dedicated to this effort go beyond the procedure group to include on-shift operators.

The maintenance department will be using personnel from the various work groups to support completion of procedure improvements. Other departments have completed, or are in the process of performing, thorough reviews of their procedures. These reviews have identified the need for changes, outdated instructions, and the need for wholesale upgrading of certain procedures.

There are other forms of written communications that contribute to our success in procedure adherence and procedure adequacy. We recognize the need to treat these forms of written communication with similar high standards of compliance. For example, we have reduced plant manager standing orders from an original 167 to less than ten currently in effect. This has been accomplished by incorporating the guidance into appropriate procedures and instructions. In addition, an effort is under way to eliminate unnecessary technical specification clarifications.

Measuring Progress

The performance assurance department will continue to review progress regarding procedure adherence in assessments of Cook Nuclear Plant activities. These are summarized at monthly AEPNGG management meetings. Relevant statistics on procedure adherence and adequacy will be monitored and reviewed periodically.

Additional assessments of procedure adherence will be conducted in late 1997, and again in 1998, one year later, to look at the overall success of the 1997 campaign.

