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SUBJECT: Comments on SALP-9 rept in areas of maint & technical support.Maint improvement program defined to improve weaknesses noted in rept.

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Donald C. Cook Nuclear Plant Units 1 and 2
License Nos. DPR-58 and DPR-74
Docket Nos. 50-315 and 50-316
RESPONSE TO SALP-9 REPORT

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

Attn: A. B. Davis

December 11, 1990

Dear Mr. Davis:

This letter provides our written comments on the SALP-9 report for the Donald C. Cook Nuclear Plant. Our comments are limited to the categories in which SALP-3 ratings were received, Maintenance and Engineering/Technical Support.

Maintenance

Probably the best indicator of the effectiveness of a maintenance program is the reliable performance of the equipment over an extended period of time. Both units performed very well during this period, especially Unit 1. The December 1989 maintenance audit, however, pointed out a number of weaknesses in our program. In response, we defined an improvement program covering all aspects of maintenance, including an implementation schedule, which we presented to the NRC in a March 15 meeting at the plant. The NRC followed our progress with a supplemental audit and inspections in the period March 13 to August 22, and the reports noted improvements in some areas as well as areas needing improvement. We continue to meet with the NRC to review the progress of our improvement program.

We are committed to continuing the program in the time frame we have defined and are committing the resources to meet the objectives defined in the program for 1991. We believe the results of the follow-up inspection that began the week of December 3 will support the improving trend.

Engineering/Technical Support

In the past two years we have made some major changes in our technical support organization with the intent of improving in this area. These changes have been reported to the NRC in several meetings. We have also upgraded our procedures and training and we believe that we have the design control and verification program well in hand. Several of the issues discussed in the Engineering/Technical Support section of the report have been the subject of meetings and correspondence with the NRC. Our position on these issues is already on record.

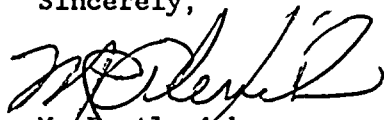
We have made major commitments in this area that reflect our intent. These include the large and small bore piping verification programs, which are in progress, and seven self-initiated inspections over the next five-year period. This inspection program includes safety systems functional inspections, a safety system outage modification inspection, and an inspection of the design control process.

Conclusion

We recognize the NRC's concerns in the areas of Maintenance and Engineering/Technical Support. During this SALP period we instituted major programs and reorganizations with the intent of improving our performance in these areas. Given the extent of these changes, some time is necessary before the full benefit can be realized. The benefit of the changes that have been made should be evident in the next SALP period. Also, we would like to continue with our quarterly review meetings. We find these meetings helpful in assessing performance. A meeting is suggested for late January 1991, following the Unit 1 outage, to report on our performance for both outages, our plans for the next outages, and any other topics of interest.

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

Sincerely,



M. P. Alexich
Vice President

eh

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