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SUBJECT: Responds to initial SALP 11 rept. Ack that util 1992
 emergency preparedness exercise performance did not meet D
 util high stds. Util 1993 exercise performance demonstrated
 that util have taken appropriate corrective actions. S

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Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
RESPONSE TO INITIAL SYSTEMATIC ASSESSMENT
OF LICENSEE PERFORMANCE (SALP) 11 REPORT

AEP:NRC:0973M

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

July 27, 1993

Gentlemen:

Thank you for the opportunity to discuss the initial Donald C. Cook Nuclear Plant SALP 11 report with your representatives during the public meeting held at the plant July 20, 1993, and to provide our comments to you in writing. We accept your ratings as presented. Specific comments concerning several of the functional areas are attached.

We believe the SALP 11 report is generally an accurate reflection of our performance at Cook Nuclear Plant over the 16-month period. In addition, we are pleased with the positive assessment of our overall performance and recognition of our continuing efforts to improve across a broad spectrum of areas. We remain committed to improving our performance through continued emphasis on issues currently being addressed and promptly resolving challenges identified. In particular, we acknowledge that our 1992 emergency preparedness exercise performance did not meet our high standards. Our 1993 exercise performance demonstrated that we have taken appropriate corrective actions. In addition, we agree with your statements concerning our preventive maintenance program. This activity is currently receiving increased attention and priority, which will result in an enhanced program. We are pleased that you are allowing our self-assessment efforts to function in the manner in which they are intended to function.

Overall, this assessment has helped us. Your recognition of our improvements is a boost in morale for all our team and rather than make us complacent, will motivate us to perform even better.

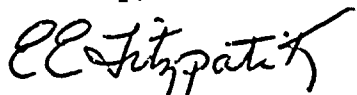
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Because future SALPs will combine several current categories making them less visible, we want to assure you that these areas will continue to receive high level attention. We also want to assure you that we will continue to provide necessary resources and management support to maintain our continuing improvement in all areas.

Sincerely,



E. E. Fitzpatrick
Vice President

rdh

Attachment

cc: A. A. Blind
G. Charnoff
J. B. Martin, Region III
T. E. Murley, Washington DC
J. R. Padgett
NFEM Section Chief
NRC Resident Inspector

ATTACHMENT TO AEP:NRC:0973M

RESPONSE TO SPECIFIC ITEMS

INITIAL SALP 11 REPORT

DONALD C. COOK NUCLEAR PLANT

Maintenance and Surveillance

We appreciate your recognition of our improved performance in the functional area of maintenance and surveillance, and are proud to have attained a superior rating. While you have recognized our improvements in self-assessment, root cause analysis, and corrective action, you also mentioned that we would be challenged in dealing with the issues raised by our self-assessments and in maintaining our overall program effectiveness. Our approach in the maintenance area will be to maintain a strong corrective maintenance program while shifting focus to being more proactive through enhanced preventive maintenance. Our goals also include reducing our corrective maintenance inventory, although we are confident that we are completing safety-related work in a timely manner and that our low threshold for identifying deficiencies contributes in a substantial manner to our current inventory.

Operations

Regarding your comments in the operations area dealing with a "lack of a questioning attitude", we are especially sensitive to this issue and have been addressing it with all nuclear organization employees.

Engineering and Technical Support

In the functional area of engineering and technical support, there are two items cited from the EDSFI on pages 8 and 9 of the initial SALP report regarding which we have comments. First, on page 8, the report states ... "management did not effectively address the problems with battery room temperature control." We have taken many proactive steps in the past 18 months to ensure that electrolyte temperatures do not go below their design basis temperatures, including: 1) calibrated thermometers have been installed in each class 1E battery room; 2) the weekly surveillance procedure has been revised listing 70°F as the minimum temperature for the A/B train battery rooms; 3) a memorandum has been issued providing plant personnel with a guideline for battery capacity compensation at low temperatures; 4) a memorandum has been issued providing plant personnel with battery room temperature guidelines and recommended actions for low temperatures; and 5) the operations department shift/tour procedure has been revised to include shiftly monitoring of the calibrated thermometers discussed in item 1 above. We believe these actions, coupled with our test program and conservative action to change batteries about every ten years, demonstrate management's active involvement with and desire to resolve this issue. We request that consideration be given to removing this statement from the report.

Second, on page 9, the report states, "In addition, ac short-circuit calculations were less conservative than accepted industry standards." In performing fault calculations, the methodology used applied nominal voltage ratings as the pre-fault voltage in determining the fault currents. This practice is referenced in the IEEE standards. We believe our actions with respect to this item are in accordance with "accepted industry standards." We conservatively assume a worst case condition where all motors are running and contributing to the fault. The auxiliary system voltage would be depressed under these conditions. An alternate calculation method could employ the 1.05 per unit voltage; however, the auxiliary system loading would be significantly less than the assumed worst case scenario; i.e., fewer motors running and contributing to the fault. In fulfillment of an EDSFI commitment, case studies are being prepared using these various calculational methods. We, therefore, request that consideration be given to removing the statement in question from the report.

Safety Assessment and Quality Verification

Of particular significance to us in the functional area of safety assessment and quality verification is your recognition of our self-assessments, QA audits, root cause analysis, and communications internally and with the NRC as areas of improvement. These are areas in which we have placed a high level of effort to improve our overall performance. We are determined to continue our improving trend in assessment and quality related functions.

Radiological Controls

With regard to the radiological controls functional area, we agree there is a need for improvement in monitoring and controlling radioactive material. We believe, however, that overall we performed better than the rating indicates. Our trend of key performance indicators at Cook Nuclear Plant shows significant improvement in radiation worker practices. Taking into account outage and non-outage years, a decreasing trend has been established for the cumulative dose for the years 1987 through 1992. In addition, the decrease in personnel contamination events during the same period, taking outages into account, has been substantial. This is notable because of the length and amount of emergent work during the 1992 refueling outages.

A specific example of a 1993 radiological success is the spent fuel pool rerack project. Results thus far show that only two personnel contamination events were attributable to project work despite extended work in posted contaminated areas and the handling of contaminated fuel racks. In addition, current

projections are that cumulative dose for the job will be less than two person-rem, which is three to five times less than the dose received performing this task for other recent rerack jobs. Another example is the disassembly and removal of the radioactive waste evaporator. This effort did not pose any penalty to our radiological goals.

Our improved performance was not brought about through source reduction or area decontamination alone. A conscious effort has been put forth to improve all aspects of Cook Nuclear Plant radiation worker performance. With our 1993 cumulative dose anticipated to be approximately 50 rem, we expect our three-year average dose to be among the best, if not the best, in the industry.