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March 2, 1998

AEP:NRC:1260G7

Docket Nos.: 50-315
50-316

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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
DOCUMENT INFORMATION PRESENTED DURING
FEBRUARY 27, 1998, PUBLIC MEETING

The purpose of this letter is to document the information we provided you with during the February 27, 1998, public meeting held at the Cook Nuclear Plant in Bridgman, Michigan.

Attachment 1 provides copies of the overhead slides that were used during the February 27, 1998, meeting.

Sincerely,

E. E. Fitzpatrick
Vice President

/vlb

Attachments

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

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ATTACHMENT 1 TO AEP:NRC:1260G7

OVERHEAD SLIDES USED DURING
FEBRUARY 27, 1998, PUBLIC MEETING

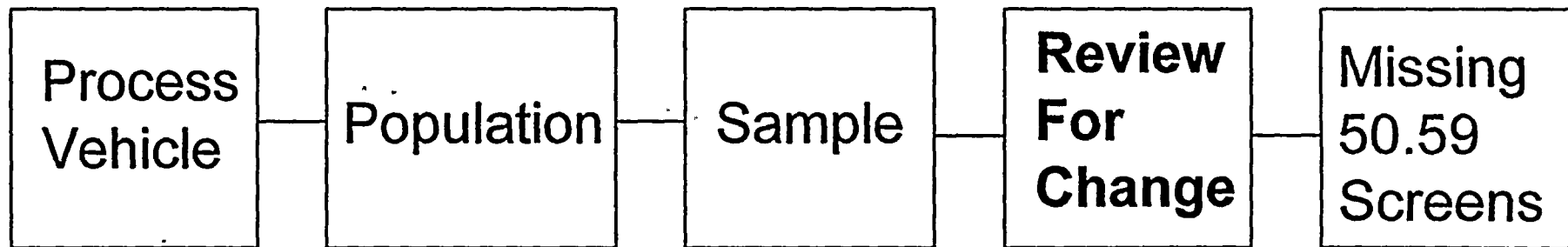


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50.59 BYPASS EVALUATION

Paul Barrett
Performance Assurance Director

Evaluation Process



Impact of inadequacies

- Safety Evaluations
- Operability
- Unreviewed safety questions
- Program deficiencies

Change

- A change is any activity, including modifications to plant hardware or procedures, or new tests or experiments, that may affect the design, function, or method of performing the function of a structure, system, or component (SSC) as described in the updated final safety analysis report (UFSAR). An activity involving a SSC not explicitly described in the UFSAR that has the potential to impact the function of a SSC that is explicitly described in the UFSAR is also considered a change.

Process Vehicle	Population	Years reviewed	Sample Size	Changes that required a new 50.59 screening	# of Safety Evaluations Required	# of Operability Concerns	# of Unreviewed Safety Questions Identified	Does the current process vehicle need a change
Engineering Specifications	1,429 Revisions, C.S., & Addendum.	1975-1998	60	0	0	0	0	No, Previously Revised
AR's / JO's	1,124 & Several 1,000	1987-1997	120	9	0	0	0	Yes
Drawing Changes	2,074 Drawings	1980-1995	121 dwg. W/ 305 rev's	12	0	0	0	Yes,
Operability Determination	29 (100%)	1980-1995	29 (100%)	0	0	0	0	No, Previously Revised
Technical Direction Memo's	176 Memo's	1994-1998	60	6	0	0	0	Yes
NPM Evaluations	3196 Evaluations	1991-1998	60	4	0	0	0	Yes
Mech. Engineering Memo's	115 Memo's	1980-1995	60	3	0	0	0	No Longer Exists
Elec. Engineering Memo's	168 Memo's	1980-1995	60	3	0	0	0	No Longer Exists
Design Change Deter.	885 Determinations	1989-1997	60	7	0	0	0	Yes
Condition reports	799 CR's	1986-1997	60	5	0	0	0	Yes
ASP's Receipt Inspection	20,171 Receipt Inspection Pkgs.	1975-1997	198	3	0	0	0	Yes

Process Vehicle	Population	Years reviewed	Sample Size	Changes that required a new 50.59 screening	# of Safety Evaluations Required	# of Operability Concerns	# of Unreviewed Safety Questions Identified	Does the current process vehicle need a change
Design Standards	582 Revisions	1980-1998	115	10	0	0	0	Yes
Design Change Addendum	1,667 Design Change Units, Rev., & Sub-tasks	1980-1995	62 pkgs. (120 addendum)	6	0	0	0	No, Previously Revised
Elec. & I & C Setpoints	814	1975-1997	60	0	0	0	0	No, Previously Revised
DCDIR's	6,584	1987-1998	60	0	0	0	0	No
Tech. Data Book	153 Figures	1992-1997	60	5	0	0	0	Yes
PMI - 5023 Plant Fabrications, Repairs	55 (100%) Travelers	1994-1998	55 (100%)	0	0	0	0	No
Dedication Plans	1,346 Revisions	1988-1998	60	3	0	0	0	Yes
Old Clearances / Caution tags	109 (100%)	1990-1998	109 (100%)	1				Yes
Open items log	150 (100%)	1995-1998	150 (100%)	1				Yes
Workaround / watch list PMI-4016	29 (100%)	1996-1998	29 (100%)	0	0	0	0	No
Temp. operator aid	58 (100%)	1990-1998	58 (100%)	8				Yes
Permanent operator aid	210 (100%)	1985-1998	210 (100%)	2				Yes
TOTAL	N / A	N / A	1916	88	0	0	0	N / A



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ADDITIONAL 10 CFR 50.59 SELF-ASSESSMENT

JEB KINGSEED
MANAGER, NUCLEAR SAFETY

50.59 Self-assessment Agenda

- Focus
- Scope
- Team composition
- Observations
- Results

10 CFR 50.59 Self Assessment Focus

- Operability issues
- Unreviewed safety questions
- Improperly dispositioned screenings

10 CFR 50.59 Self Assessment Scope

- 60 random samples from 50.59 products produced by engineering between 1980-1995
- 60 random samples from 50.59 products produced by plant maintenance, operations & technical support staff between 1980-1995

Team Composition

- Team Composed of personnel from:
 - Nuclear Safety
 - Nuclear Licensing
 - Nuclear Fuels
 - Operations
- Training:
 - Qualified to perform 50.59 products they reviewed
 - Trained on recent design/licensing basis insights
 - Review addressed consideration of ATWS and SBO as “previously analyzed accidents”

Observations

Engineering Products

- 17 of 60 products inadequately justified by today's standards:
 - Evaluations with correct conclusion that did not directly address all 7 USQD process questions
 - Evaluations where answers were little more than negative repetition of the question
 - Evaluations that addressed Tech Spec & Chapter 14 engineering issues w/o 7 questions

Observations

Engineering Products (cont'd)

- One evaluation did not direct a needed change to UFSAR. Though it was verified that the necessary change had been implemented, the source of UFSAR change initiation could not be verified due to historical age of document.

Observations

Engineering Products (cont'd)

- A safety evaluation documented the rejection of a minor modification due to its potential to “increase the malfunctions of equipment important to safety” and offered alternatives.
- Quality of 50.59 products increased from 1980 to 1995. All inadequately justified products were prior to 1994.

Observations

Plant Products

- 13 of 60 products inadequately justified by today's standards:
 - No references to UFSAR and Tech Spec sections reviewed
 - Change not adequately described
 - References given, but answers on screening questions not justified

Observations

Plant Products (cont'd)

- Quality of 50.59 products increased between 1980 and 1995. All inadequately documented screenings were prior to 1994.

Results

- No operability issues due to 50.59 process
- No unreviewed safety questions
- No improperly dispositioned 50.59 screenings or safety evaluations.
- Programs in place to address other identified long-term issues (UFSAR Update Program and 10 CFR 50.59 Training).



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AE INSPECTION PROGRAMMATIC ISSUES

Tom Quaka
Project Management & Installation
Services Manager

Mission and Purpose

To:

- Independently review AE inspection information with program perspective
- Identify other weaknesses
- Recommend and verify corrective actions

Mission and Purpose (cont'd)

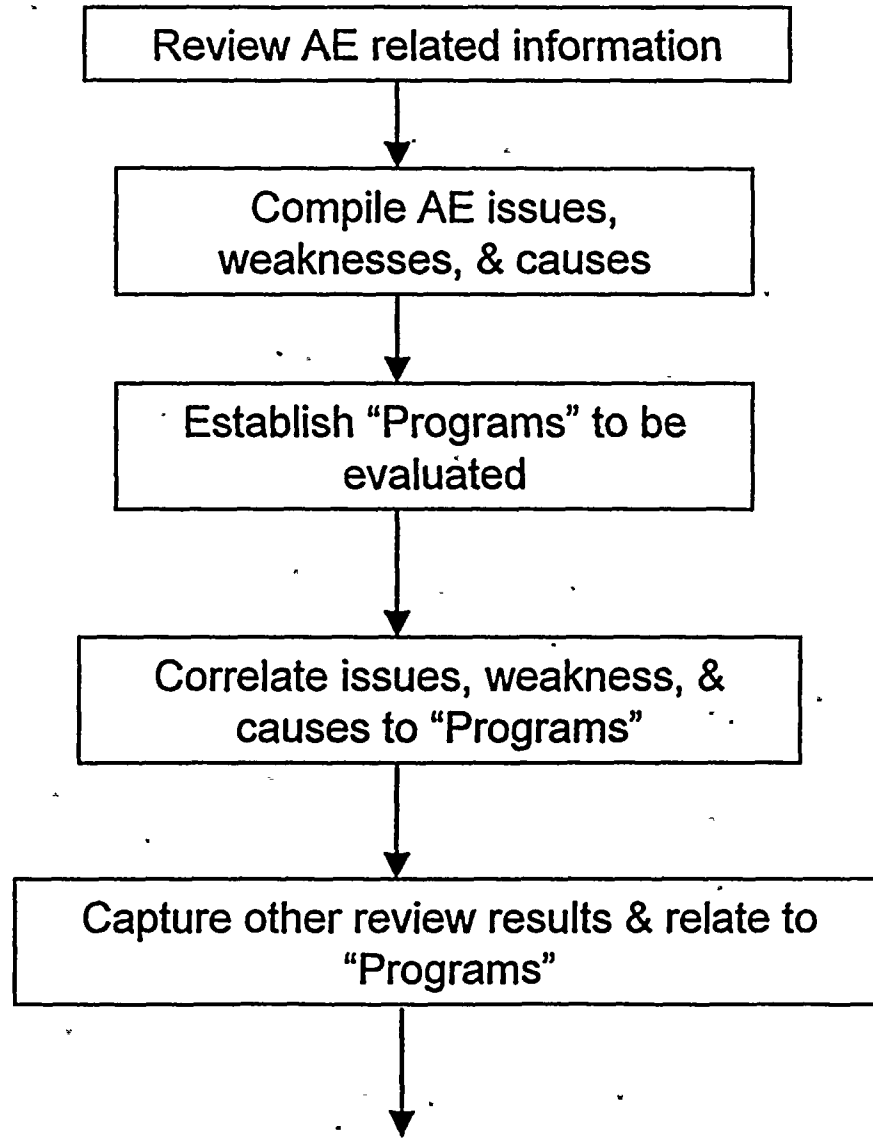
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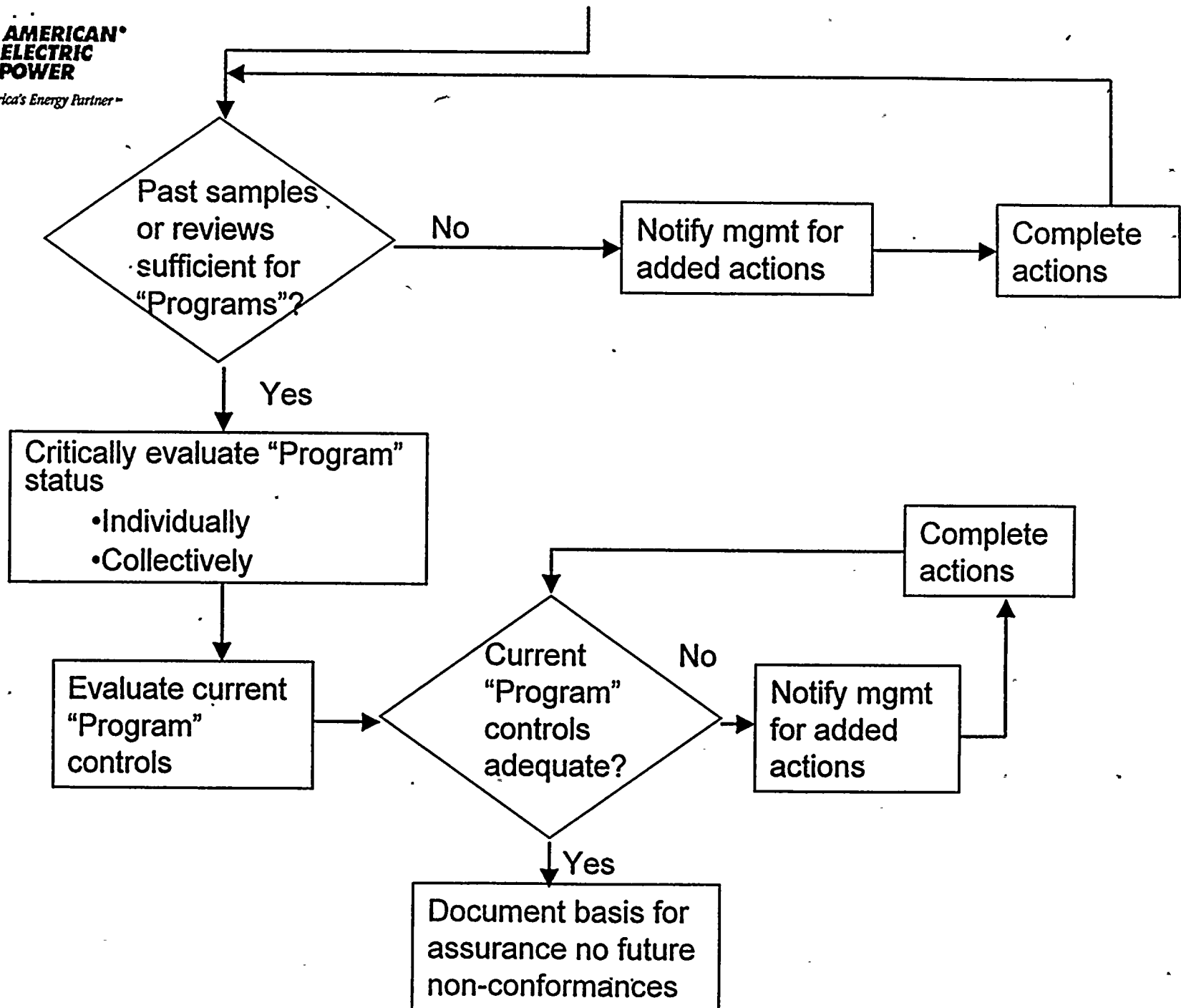
- Nature and extent of past programmatic issues characterized
- Assurance reviews identified program or design bases concerns
- Current programs will prevent future non-conformances or inoperability

Team Composition

- Nine member team assembled from
 - Design Engineering
 - Regulatory Affairs
 - Performance Assurance
 - Production Engineering

TEAM APPROACH





Team “Programs”

- Preservation of Design and Licensing Bases
- Design Change
- 10 CFR 50.59 Implementation
- Calculations
- Instrument Uncertainty

Team "Programs" (cont'd)

- Developing & Maintaining Procedures
- Corrective Action
- Quality Assurance Related to AE Issues
- Review of NRC/Industry OE Information

Team Actions

- Independent re-review of 20 system functional calculations
 - Using structured review process
 - Uniform characterization of results
 - Technical Oversight Committee (TOC)
- Expanded to statistically significant sample

