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SUBJECT: Submits response to SALP 14 board rept re NRC insp repts
 50-315/98-01 & 50-316/98-01. Corrective actions: key to
 achieving engineering improvement goal renewed appreciation
 of design & licensing basis.

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 TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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May 4, 1998

AEP:NRC:1289

Docket Nos.: 50-315
50-316

U.S. Nuclear Regulatory Commission
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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
NRC INSPECTION REPORT NO. 50-315/98001; 50-316/98001
RESPONSE TO SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
(SALP) 14 BOARD REPORT

We are writing to provide information requested during the meeting between the NRC and Cook Nuclear Plant on April 3, 1998. The assessments and resulting ratings presented in the report are considered fair and reasonable assessments of performance and we accept the ratings as presented. The attachment to this letter constitutes the thirty day response requested in your cover letter to the SALP report dated March 19, 1998.

Specifically, the SALP report identified acceptable, but declining, performance in the area of engineering. Engineering issues were identified in important technical areas during this assessment period. A presentation of the nuclear engineering improvement program, as it existed in its early stage, was made as part of the SALP meeting. Developmental work on the program has continued and its current status is presented in the attachment to this letter. The status of the engineering improvement plan development, as well as progress reports on actions already underway, will be included in the periodic updates we will be providing to the NRC as part of our restart plan. We will submit the finalized engineering improvement program plan for your review when it has been completed.

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Finally, we want to assure you that we will continue to provide the necessary resources and management attention needed to maintain and improve our level of performance in the other SALP areas of plant operations, maintenance and plant support.

Sincerely,



J. R. Sampson
Vice President

/vlb

Attachment

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



ATTACHMENT TO AEP:NRC:1289

NRC INSPECTION REPORT NOS. 50-315/98001 AND 50-316/98001
RESPONSE TO SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
(SALP) 14 BOARD REPORT - ENGINEERING IMPROVEMENT PROGRAM

The systematic assessment of licensee performance (SALP) report no. 50-315/98001; 50-316/98001 for Cook Nuclear Plant units 1 and 2 identified acceptable, but declining, performance in the area of engineering. This letter constitutes the thirty day response requested in your March 19, 1998, cover letter to the SALP report.

OVERVIEW

The effectiveness of our process to update the design and licensing basis, and the discrepancies identified in safety evaluations, calculations, and engineering analyses were discussed in the SALP report. Raising of these concerns over the past few months, in conjunction with information from recent self-assessments, has allowed us to recognize that our past performance was not consistent with expectations. The goals of the restart plan, which were described in the SALP presentation on April 3, 1998, are to identify and resolve issues important to restart, and safe operation of the plant within its design basis following restart.

In conjunction with the restart plan, a specific engineering improvement program (EIP) is being undertaken to ensure a focus on achieving excellence in engineering. The program will encompass upgrading the quality of engineering outputs and products and will establish and maintain a work environment that supports a strong safety culture consistent with operational excellence. The program will be undertaken in two phases. Phase I is intended to address deficiencies that would prevent acceptable resolution of identified restart issues or would challenge our ability to support power operation of the units in a safe manner. Phase I actions will be scheduled for completion prior to restart of either unit. Some interim measures to prevent recurrence of past deficiencies may be used during phase I. Phase II will address longer term corrective action for identified weaknesses in the engineering organization and infrastructure, and will focus on efficiency and business needs in addition to providing reasonable assurance that engineering excellence is achieved. Interim measures from phase I will be replaced by or integrated into phase II corrective actions.

PROGRAM DESCRIPTION

We are currently in the discovery phase of the restart plan. One element of the discovery phase is the functional area assessment for the engineering program. Once the functional area assessment is complete, an implementation schedule and appropriate performance measures for the EIP will be developed.

Based on preliminary reviews, eight main issues will likely be addressed in the engineering improvement program. Due to their inter-relationship, some revision or regrouping of the eight issues may result as the detailed actions are developed. These areas are listed below.

Understanding the Design Basis

The engineering staff will be provided with additional means to obtain a clear understanding of the design basis. The increased understanding will enhance operation and maintenance of the plant in alignment with the assumptions of the design and licensing basis.

Maintaining the Design Basis

Configuration management improvements are needed to ensure that proposed changes to the physical plant or to design basis supporting analyses are implemented in an error-free manner and appropriately documented.

Design Control

Engineering procedures will be enhanced to improve the effectiveness of our processes and provide additional assurance that the procedures properly support our ability to maintain the design basis. Improved standards for configuration control are intended to ensure that changes arising from ongoing engineering activities are properly reflected in design basis documentation. Training and development of personnel, as well as transfer of technology and industry expertise will be implemented to improve analytical capabilities.

Material Condition

Engineering activities needed to support maintenance of the material condition of plant equipment will be improved to provide additional assurance of equipment performance consistent with design basis assumptions.

Personnel Qualifications

Engineering personnel must be trained and qualified to perform tasks needed to support safe and efficient operation of the plant. The program to train engineering support personnel will be upgraded to improve overall performance. Qualification standards will be developed and systematically applied to provide assurance that engineering personnel are fully qualified to perform the tasks they are assigned.

Culture

A culture where engineering champions the design basis and has a questioning attitude concerning changes to design basis must be developed. The culture is intended to support a significantly reduced tolerance for degraded and non-conforming conditions, not only in the physical plant but also in the documentation supporting

the design basis. Excellence within engineering must be fostered by increasing the importance assigned to continuous improvement, interaction with industry peers, and professionalism within the organization.

Engineering Backlog

Better control of the engineering backlog is needed to improve responsiveness to the needs of operations and maintenance.

Engineering Infrastructure

The quality of the processes, procedures, documentation and analytical tools provided to engineers must be improved in order for them to meet our expectations.

DISCUSSION

Important elements of the program will include refining the organization structure, enhancing human performance, and strengthening the engineering infrastructure.

While the complete EIP plan has yet to be defined, a number of actions that will become an integral part of the program are already underway.

The design basis reconstitution project (DBRP) is reviewing the updated final safety analysis report, licensing information, operations procedures, and calculations to ensure alignment with the current design basis. When differences are found, actions to realign these documents are undertaken. DBRP will also address accessibility of design basis information to all parts of the engineering and plant organizations.

An engineering work management group is being initiated within engineering to help establish priorities and allocate resources to ensure that both the day-to-day and long term engineering needs of the plant are met. An important function of this group will be to manage the reduction of engineering backlogs. Backlogs to be addressed include installed, but not fully closed out, design changes, as-built drawing revisions, condition reports, work control requests, and industry operating experience reviews.

A quality verification group is being initiated within the engineering organization to provide prompt feedback on the quality of key engineering products. The group will report directly to the head of engineering. This group will play a key role in ensuring that engineering outputs developed to resolve restart items contain the proper quality attributes. It will also provide valuable feedback on the effectiveness of instilling a new culture within the engineering organization.

Development and implementation of a new engineering training program is in progress.

A staffing analysis to determine the appropriate size and composition of the engineering staff is underway. This study specifically recognizes the extraordinary staffing requirements needed during the next few years to support the DBRP and achieve excellence in our engineering programs.

An independent survey to assess the present culture of the engineering organization has been undertaken. Preliminary results are being factored into various elements of the EIP plan. Continuing surveys will help assess the effectiveness of corrective actions.

The key to achieving our engineering improvement goal is a renewed appreciation of the design and licensing basis. The above discussion points out the deficient areas we must address and notes some corrective actions already underway. We have much work left to do to develop a detailed EIP plan and integrate it with the restart plan, specifically the selection of those actions needed to be completed prior to restart.

The status of the EIP plan development, as well as progress reports on actions already underway, will be included in the periodic updates provided as part of the restart plan. The format of that update is yet to be finalized with the NRC. We will submit the finalized EIP plan for your review when it has been completed.

