

1982 Evaluation

D.C. Cook
Nuclear Plant
Indiana & Michigan
Electric Company

Inspection - March 1982

INPO

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EVALUATION
of
DONALD C. COOK NUCLEAR PLANT

Indiana & Michigan Electric Company

SUMMARY

INTRODUCTION

The Institute of Nuclear Power Operations (INPO) conducted an evaluation of Indiana & Michigan Electric Company's (I&M) Donald C. Cook Nuclear Plant during the weeks of March 15 and March 22, 1982. The plant is located on the southeastern shore of Lake Michigan near the city of Benton Harbor, Michigan. The plant has two Westinghouse pressurized water reactors rated at 1054 and 1100 Mwe (NET). Unit one began commercial operations in August 1975 and unit two in July 1978.

PURPOSE AND SCOPE

INPO conducted an evaluation of site activities to make an overall determination of plant safety, to evaluate management systems and controls, and to identify areas needing improvement. Information was assembled from discussions, interviews, observations, and reviews of documentation.

The INPO evaluation team examined plant organization and administration, operations, maintenance, technical support, training and qualification, radiological protection, and chemistry. The team also observed the actual performance of selected evolutions and surveillance testing. Corporate activities were not included in the scope of the evaluation, except as an incidental part of the plant evaluation. As a basis for the evaluation, INPO used performance objectives and criteria relevant to each of the areas examined; these were applied and evaluated in light of the experience of team members, INPO's observations, and good practices within the industry.

INPO's goal is to assist member utilities in achieving the highest standards of excellence in nuclear plant operation. The recommendations in each area are based on best practices, rather than minimum acceptable standards or requirements. Accordingly, areas where improvements are recommended are not necessarily indicative of unsatisfactory performance.

DETERMINATION

The following beneficial practices and accomplishments were noted:

In each of the areas evaluated, INPO has established PERFORMANCE OBJECTIVES and supporting criteria. All PERFORMANCE OBJECTIVES reviewed during the course of this evaluation are listed in APPENDIX II.

Findings and recommendations are listed under the PERFORMANCE OBJECTIVES to which they pertain. Particularly noteworthy conditions that contribute to meeting PERFORMANCE OBJECTIVES are identified as Good Practices. Other findings describe conditions that detract from meeting the PERFORMANCE OBJECTIVES. It would not be productive to list as Good Practices those things that are commonly done properly in the industry since this would be of no benefit to Indiana & Michigan Electric Company or to INPO's other member utilities. As a result, most of the findings highlight conditions that need improvement.

The recommendations following each finding are intended to assist the utility in ongoing efforts to improve all aspects of its nuclear programs. In addressing these findings and recommendations the utility should, in addition to correcting or improving specific conditions, pursue underlying causes and issues.

The evaluation staff appreciates the cooperation received from all levels of the Indiana & Michigan Electric Company and American Electric Power Service Corporation.

ORGANIZATION AND ADMINISTRATION

MISSION, GOALS, AND OBJECTIVES

PERFORMANCE OBJECTIVE: Station mission, goals, and objectives should be established and progress monitored through a formal program.

Finding
(OA.2-1)

Recommendation

Response

MANAGEMENT ASSESSMENT AND QUALITY PROGRAMS

PERFORMANCE OBJECTIVE: Management should assess station activities to ensure and enhance quality performance of all aspects of nuclear plant operation.

Finding
(OA.3-1)

Recommendation

Response

Finding
(OA.3-2) Plant personnel are not always aware of action commitments made by off-site organizations. Examples were noted where the plant was not aware of and, therefore, did not implement action commitments made by personnel at AEP headquarters.

Recommendation Establish a method to ensure that plant management takes appropriate action on all applicable commitments.

Response This problem had been identified prior to the INPO evaluation, a concentrated effort had been initiated by the plant to search and make current all items for which the plant has commitments. The QA Department maintains appropriate records for plant commitments and follows up to ensure that required items are addressed on time.

The existing "Computerized Commitment Program" (AEP General Procedure No. 2.2) is used to notify personnel of commitment assignments and track their closeouts. This is being reviewed to ascertain where methods can be improved to enhance the overall effectiveness of the program for use both at the plant and the AEPSC Engineering Office. Results of the review are scheduled for implementation by September 1982.

Finding
(OA.3-3) Management and supervisory personnel need to be more involved in monitoring and assessing important aspects of plant activities. Numerous material deficiencies, industrial safety discrepancies and procedural problems requiring corrective action had not been brought to the attention of management.

Recommendation Managers and supervisors should frequently inspect the plant to observe actual operations and plant conditions and to identify deficiencies and out-of-specification conditions. Follow-up actions should be utilized to ensure that corrective action is completed for all identified problems.

Response The program of regular tours and feedback on observations was placed in effect June 4, 1982. The plant manager recognizes the concomitant necessity to reduce the administrative workload currently exists in order that this new requirement not be an added assignment.

DOCUMENT CONTROL

PERFORMANCE OBJECTIVE: Document control systems should provide correct, readily accessible information to support station requirements.

Finding
(OA.6-1)

Recommendation

Response

OPERATIONS

PLANT STATUS CONTROLS

PERFORMANCE OBJECTIVE: Operational personnel should be cognizant of the status of plant systems and equipment under their control, and should ensure that systems and equipment are controlled in a manner that supports safe and reliable operation.

Finding
(OP.3-1)

Recommendation

Response

Finding
(OP.3-2)

Recommendation

Response

Finding
(OP.3-3)

Recommendation

Response

Finding
(OP.3-4)

Recommendation

Response

Finding
(OP.3-5)

Recommendation

Response

OPERATIONS PROCEDURES AND DOCUMENTATION

PERFORMANCE OBJECTIVE: Operational procedures and documents should provide appropriate direction and should be effectively used to support safe operation of the plant.

Finding
(OP.5-1)

Recommendation

Response

Finding
(OP.5-2)

Recommendation

Response

OPERATIONS FACILITIES AND EQUIPMENT

PERFORMANCE OBJECTIVE: Operational facilities and equipment should effectively support plant operation.

Finding
(OP.6-1)

Recommendation

Response

Finding
(OP.6-2)

Recommendation

Response

Finding
(OP.6-3)

Recommendation

Response

Finding
(OP.6-4)

Recommendation

Response

MAINTENANCE

PLANT MATERIAL CONDITION

PERFORMANCE OBJECTIVE: The material condition of the plant should be maintained to support safe and reliable plant operation.

Finding
(MA.2-1)

Recommendation

Response

WORK CONTROL SYSTEM

PERFORMANCE OBJECTIVE: The control of work should ensure that identified maintenance actions are properly completed in a safe, timely, and efficient manner.

Finding
(MA.3-1)

Recommendation

Response

Finding
(MA.3-2)

Recommendation

Response

Finding
(MA.3-3)

CONDUCT OF MAINTENANCE

PERFORMANCE OBJECTIVE: Maintenance should be conducted in a manner that ensures efficient and effective plant operation.

Finding
(MA.4-1)

Recommendation

Response

Finding
(MA.4-2)

Recommendation

Response

TRAINING AND QUALIFICATION

TRAINING ORGANIZATION AND ADMINISTRATION

PERFORMANCE OBJECTIVE: The training organization and administrative systems should ensure effective control and implementation of training activities.

Finding
(TQ.1-1)

Recommendation

Response

LICENSED OPERATOR TRAINING AND QUALIFICATION

PERFORMANCE OBJECTIVE: The licensed operator training and qualification program should develop and improve the knowledge and skills necessary to perform assigned job functions.

Finding
(TQ.3-1)

Recommendation

Response

MAINTENANCE PERSONNEL TRAINING AND QUALIFICATION

PERFORMANCE OBJECTIVE: The maintenance personnel training and qualification program should develop and improve the knowledge and skills necessary to perform assigned job functions.

Finding
(TQ.5-1)

Recommendation

Response

Finding
(TQ.5-2)

Recommendation

Response

GENERAL EMPLOYEE TRAINING

PERFORMANCE OBJECTIVE: The general employee training program should develop broad understanding of employee responsibilities and safe work practices.

Finding
(TQ.7-1)

Recommendation

Response

TECHNICAL SUPPORT

TECHNICAL SUPPORT ORGANIZATION AND ADMINISTRATION

PERFORMANCE OBJECTIVE: The technical support organization and administrative systems should ensure effective control and implementation of department activities.

Finding
(TS.1-1)

Recommendation

Response

OPERATING EXPERIENCE REVIEW PROGRAM

PERFORMANCE OBJECTIVE: Industrywide and in-house operating experiences should be evaluated and appropriate actions undertaken to improve plant safety and reliability.

Finding
(TS.3-1)

Recommendation

Response

Finding
(TS.3-2)

Recommendation

Response

PLANT MODIFICATIONS

PERFORMANCE OBJECTIVE: Plant modification programs should ensure proper review, control, implementation, and completion of plant design changes in a safe and timely manner.

Finding
(TS.4-1)

Recommendation

Response

Finding
(TS.4-2)

Recommendation

INDIANA & MICHIGAN ELECTRIC COMPANY

Response Summary

The Indiana & Michigan Electric Company is pleased that INPO found the Donald C. Cook Nuclear Plant being operated in a safe manner. As a result of the INPO evaluation, we have become aware of a number of areas that need improvement. We appreciate these INPO findings and recommendations for they should help the Cook Nuclear Plant meet the benchmarks of excellence for nuclear power operation.

Response

Finding
(TS.4-3)

Recommendation

Response

Finding
(TS.4-4)

Recommendation

Response

PLANT EFFICIENCY AND RELIABILITY MONITORING

PERFORMANCE OBJECTIVE: Performance monitoring activities should optimize plant thermal performance and reliability.

Finding
(TS.6-1)

Recommendation

Response

RADIOLOGICAL PROTECTION

RADIOLOGICAL PROTECTION ORGANIZATION AND ADMINISTRATION

PERFORMANCE OBJECTIVE: The organization and administrative systems should ensure effective control and implementation of the radiological protection program.

Finding
(RP.1-1)

Recommendation

Response

Finding
(RP.1-2)

Recommendation

Response

Finding
(RP.1-3)

Recommendation

Response

GENERAL EMPLOYEE TRAINING IN RADIOLOGICAL PROTECTION

PERFORMANCE OBJECTIVE: General employee training should ensure that plant personnel, contractors, and visitors have the knowledge and practical abilities necessary to effectively implement radiological protection practices associated with their work.

Finding
(RP.3-1)

Recommendation

Response

EXTERNAL RADIATION EXPOSURE

PERFORMANCE OBJECTIVE: External radiation exposure controls should minimize personnel radiation exposure.

Finding
(RP.4-1)

INTERNAL RADIATION EXPOSURE

PERFORMANCE OBJECTIVE: Internal radiation exposure controls should minimize internal exposures.

Finding
(RP.5-1)

Recommendation

Response

Finding
(RP.5-2)

Recommendation

Response

Finding
(RP.5-3)

Recommendation

Response

SOLID RADIOACTIVE WASTE

PERFORMANCE OBJECTIVE: Solid radioactive waste controls should minimize the volume of radioactive waste and ensure safe transportation of radioactive material.

Finding
(RP.7-1)

Recommendation

Response

PERSONNEL DOSIMETRY

PERFORMANCE OBJECTIVE: The personnel dosimetry program should ensure that radiation exposures are accurately determined and recorded.

Finding
(RP.8-1)

Recommendation

Response

RADIOACTIVE CONTAMINATION CONTROL

PERFORMANCE OBJECTIVE: Radioactive contamination controls should minimize the contamination of areas, equipment, and personnel.

Finding
(RP.9-1)

Recommendation

Response

CHEMISTRY

CHEMISTRY ORGANIZATION AND ADMINISTRATION

PERFORMANCE OBJECTIVE: The organization and administrative systems should ensure effective implementation and control of the chemistry program.

Finding
(CY.1-1)

Recommendation

Response

Finding
(CY.1-2)

Recommendation

Response

Finding
(CY.1-3)

Recommendation

Response

Finding
(CY.1-4)

Recommendation

Response

CHEMISTRY PERSONNEL QUALIFICATION

PERFORMANCE OBJECTIVE: The chemistry qualification program should ensure that chemistry personnel have the knowledge and practical abilities necessary to implement chemistry practices effectively.

Finding
(CY.2-1)

Finding
(CY.2-2)

Recommendation

Response

CHEMISTRY CONTROL

PERFORMANCE OBJECTIVE: Chemistry controls should ensure optimum chemistry conditions during all phases of plant operation.

Finding
(CY.3-1)

Recommendation

Response

Finding
(CY.3-2)

Recommendation

Response

Finding
(CY.3-3)

Recommendation

Response

LABORATORY ACTIVITIES

PERFORMANCE OBJECTIVE: Laboratory and counting room activities should ensure accurate measuring and reporting of chemistry parameters.

Finding
(CY.4-1)

Recommendation

Response

Finding
(CY.4-2)

Recommendation

Response

Finding
(CY.4-3)

Recommendation

Response

Finding
(CY.4-4)

Recommendation

Response

CHEMICAL AND LABORATORY SAFETY

PERFORMANCE OBJECTIVE: Work practices associated with chemistry activities should ensure the safety of personnel.

Finding
(CY.5-1)

Recommendation

Response

APPENDIX I

Summary of Outstanding Response Action from Previous Evaluation (1980)

Organization Structure
(INPO Procedure OA-102, Rev 2)

2. Finding (Ref. Criterion B)

Recommendation

Response

Status

ADMINISTRATIVE CONTROLS
(INPO Procedure OA-103, Rev.1)

Finding (Ref. Criterion E)

Recommendation

Response

Status

RADIATION PROTECTION AND CHEMISTRY, ORGANIZATION AND
ADMINISTRATION

(INPO Procedure RC-501, Rev.1)

2. Finding (Ref. Criterion D)

Recommendation

Response

Status

ALARA PROGRAM

(INPO Procedure RC-502, Rev.1)

Finding (Ref. Criteria A, B, C, D, and E)

Recommendation

Response

Status

APPENDIX II

Performance Objectives Reviewed

ORGANIZATION AND ADMINISTRATION

OA.1 Station Organization and Administration

Station organization and administrative systems should ensure effective implementation and control of station activities.

OA.2 Mission, Goals, and Objectives

Station mission, goals, and objectives should be established and progress monitored through a formal program.

OA.3 Management Assessment and Quality Programs

Management should assess station activities to ensure and enhance quality performance of all aspects of nuclear plant operation.

OA.4 Personnel Planning and Qualification

Personnel programs should ensure that station positions are filled by individuals with proper job qualifications.

OA.5 Industrial Safety

Station industrial safety programs should achieve a high degree of personnel safety.

OA.6 Document Control

Document control systems should provide correct, readily accessible information to support station requirements.

OPERATIONS

OP.1 Operations Organization and Administration

The operations organization and administrative systems should ensure effective control and implementation of department activities.

OP.2 Conduct of Operations

Operational activities should be conducted in a manner that achieves safe and reliable plant operation.

OP.3 Plant Status Controls

Operational personnel should be cognizant of the status of plant systems and equipment under their control, and should ensure that systems and equipment are controlled in a manner that supports safe and reliable operation.

OP.4 Operations Knowledge and Performance

Operator knowledge and performance should support safe and reliable plant operation.

OP.5 Operations Procedures and Documentation

Operational procedures and documents should provide appropriate direction and should be effectively used to support safe operation of the plant.

OP.6 Operations Facilities and Equipment

Operational facilities and equipment should effectively support plant operation.

MAINTENANCE

MA.1 Maintenance Organization and Administration

The maintenance organization and administrative systems should ensure effective control and implementation of department activities.

MA.2 Plant Material Condition

The material condition of the plant should be maintained to support safe and reliable plant operation.

MA.3 Work Control System

The control of work should ensure that identified maintenance actions are properly completed in a safe, timely, and efficient manner.

MA.4 Conduct of Maintenance

Maintenance should be conducted in a manner that ensures efficient and effective plant operation.

MA.5 Preventive Maintenance

The preventive maintenance programs should contribute to optimum performance and reliability of plant equipment.

MA.6 Maintenance Procedures and Documentation

Maintenance procedures should provide appropriate directions for work and should be used to ensure that maintenance is performed safely and efficiently.

MA.7 Maintenance History

The maintenance history should be used to support maintenance activities and optimize equipment performance.

MA.8 Maintenance Facilities and Equipment

Facilities and equipment should effectively support the performance of maintenance activities.

TECHNICAL SUPPORT

TS.1 Technical Support Organization and Administration

The technical support organization and administrative systems should ensure effective control and implementation of department activities.

TS.2 Surveillance Testing Program

Surveillance inspection and testing activities should provide assurance that equipment important to safe and reliable plant operation will perform within required limits.

TS.3 Operations Experience Review Program

Industrywide and in-house operating experiences should be evaluated and appropriate actions undertaken to improve plant safety and reliability.

TS.4 Plant Modifications

Plant modification programs should ensure proper review, control, implementation, and completion of plant design changes in a safe and timely manner.

TS.5 Reactor Engineering

On-site reactor engineering activities should ensure optimum nuclear reactor operation without compromising design or safety limits.

TS.6 Plant Efficiency and Reliability Monitoring

Performance monitoring activities should optimize plant thermal performance and reliability.

TS.7 Technical Support Procedures and Documentation

Technical support procedures and documents should provide appropriate direction and should be effectively used to support safe operation of the plant.

TRAINING AND QUALIFICATION

TQ.1 Training Organization and Administration

The training organization and administrative systems should ensure effective control and implementation of training activities.

TQ.2 Non-Licensed Operator Training and Qualification

The non-licensed operator training and qualification program should develop and improve the knowledge and skills necessary to perform assigned job functions.

TQ.3 Licensed Operator Training and Qualification

The licensed operator training and qualification program should develop and improve the knowledge and skills necessary to perform assigned job functions.

TQ.4 Shift Technical Advisor Training and Qualification

The shift technical advisor training program should develop and improve the knowledge and skills to perform assigned job functions.

TQ.5 Maintenance Personnel Training and Qualification

The maintenance personnel training and qualification program should develop and improve the knowledge and skills necessary to perform assigned job functions.

TQ.6 Technical Training for Managers and Engineers

The technical training program for engineers and managers should broaden overall knowledge of plant processes and equipment as a supplement to position-specific education and training.

TQ.7 General Employee Training

The general employee training program should develop a broad understanding of employee responsibilities and safe work practices.

TQ.8 Training Facilities and Equipment

The training facilities, equipment, and materials should effectively support training activities.

RADIOLOGICAL PROTECTION

RP.1 Radiological Protection Organization and Administration

The organization and administrative systems should ensure effective control and implementation of the radiological protection program.

RP.2 Radiological Protection Personnel Qualification

The radiological protection qualification program should ensure that radiological protection personnel have the knowledge and practical abilities necessary to effectively implement radiological protection practices.

RP.3 General Employee Training In Radiological Protection

General employee training should ensure that plant personnel, contractors, and visitors have the knowledge and practical abilities necessary to effectively implement radiological protection practices associated with their work.

RP.4 External Radiation Exposure

External radiation exposure controls should minimize personnel radiation exposure.

RP.5 Internal Radiation Exposure

Internal radiation exposure controls should minimize internal exposures.

RP.6 Radioactive Effluents

Radioactive effluent controls should minimize radioactive materials released to the environment.

RP.7 Solid Radioactive Waste

Solid radioactive waste controls should minimize the volume of radioactive waste and ensure safe transportation of radioactive material.

RP.8 Personnel Dosimetry

The personnel dosimetry program should ensure that radiation exposures are accurately determined and recorded.

RP.9 Radioactive Contamination Control

Radioactive contamination controls should minimize the contamination of areas, equipment, and personnel.

CHEMISTRY

CY.1 Chemistry Organization and Administration

The organization and administrative systems should ensure effective implementation and control of the chemistry program.

CY.2 Chemistry Personnel Qualification

The chemistry qualification program should ensure that chemistry personnel have the knowledge and practical abilities necessary to implement chemistry practices effectively.

CY.3 Chemistry Control

Chemistry controls should ensure optimum chemistry conditions during all phases of plant operation.

CY.4 Laboratory Activities

Laboratory and counting room activities should ensure accurate measuring and reporting of chemistry parameters.

CY.5 Chemical and Laboratory Safety

Work practices associated with chemistry activities should ensure the safety of personnel.