



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
801 WARRENVILLE ROAD  
LISLE, ILLINOIS 60532-4351

January 09, 2000

Mr. R. P. Powers  
Senior Vice President  
Nuclear Generation Group  
American Electric Power Company  
500 Circle Drive  
Buchanan, MI 49107-1395

**SUBJECT: SUMMARY OF THE OCTOBER 28, 1999, D. C. COOK PUBLIC MEETING**

Dear Mr. Powers:

On October 28, 1999, the Nuclear Regulatory Commission (NRC) held a public meeting at the D.C. Cook Nuclear Power Plant in Bridgman, Michigan. The meeting was held to discuss D.C. Cook restart and NRC Manual Chapter (MC) 0350 oversight inspections. Formal presentations were made by the Indiana Michigan Power Company (licensee) staff. Enclosure 1 is a list of attendees of the meeting, and a copy of the slides used by the licensee is provided as Enclosure 2.

The MC 0350 public meetings between the licensee and the NRC staff are designed to provide a mechanism for the exchange of information and an update on the status of the readiness of the units at D. C. Cook to restart. High-level management from the NRC and the licensee participated in the meetings.

The licensee's presentations at the October 28, 1999, meeting provided the status of the Case Specific Checklist items, the revision to the Restart Plan, Operations Department readiness for restart, and Performance Assurance audit status and findings.

Mr. Bakken stated that the plant continues to make progress toward restart. Entry into Mode 2 (Startup) for Unit 2 slipped back approximately 2 weeks due to difficulties with ice condenser work and resolution of engineering related issues. Mr. Harland stated that Unit 2 was currently scheduled to enter Mode 2 on February 6, 2000; and full power was scheduled for February 18, 2000. Mr. Harland stated that up to 125 more contractors would augment the maintenance department staff to support Unit 2 restart. Mr. Harland compared the LaSalle Unit 2 Nuclear Plant schedule progress chart (when LaSalle Unit 2 was in a similar restart situation) with the D. C. Cook chart and noted similar trends regarding progress toward restart.

Mr. Harland discussed the status of the 218 actual or potential plant modifications to be implemented prior to restart. Mr. Harland stated that 127 of the modification packages were delivered to the field or currently scheduled. At least 17 of the modifications were considered major modifications (schedules needed); 9 of the modifications were on hold pending evaluation. Mr. Harland stated that challenges included engineering deliverables, schedule adherence, and doing it right the first time. (Mr. Pollock commented that maintenance department personnel created a rework program to evaluate maintenance failures and that the

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Performance Assurance organization would evaluate the program's effectiveness.) Items which could potentially impact the schedule included motor-operated valves, equipment qualification, high energy line breaks, lake water temperature (summer restraint), and electrical distribution. Licensee and NRC personnel discussed the schedule for the motor-operated valve inspection, which was changed from mid-December 1999 to mid-January 2000.

Mr. Godley discussed closure of the Confirmatory Action Letter. The licensee's October 25, 1999, letter documented the licensee's position that Confirmatory Action Letter Items 2, 5, and 6 were closed. The licensee submitted a Technical Specification change as part of the resolution of Confirmatory Action Letter Item 1. The licensee has determined that the actions required to address Confirmatory Action Letter Item 3 are not consistent with the current licensing basis. The licensee and the NRC intend to discuss this issue more fully. Emergency operating procedure validation would address Confirmatory Action Letter Item 4. The licensee is developing a containment cleanliness standard to fully address Confirmatory Action Letter Item 7. The licensee has addressed the specific issue regarding Confirmatory Action Letter Item 8, but is re-baselining control room and offsite dose calculations as part of a broader corrective action. Mr. Godley stated that Confirmatory Action Letter Item 9 would be addressed by the currently committed date of December 31, 1999.

Mr. Godley discussed the Restart Action Plan progress and Performance Chart. In addition, Mr. Godley discussed key licensing activities and changes. The licensee was currently working an undervoltage setpoint change Technical Specification Amendment request and expects to send the submittal to NRC on November 9, 1999. Also, Mr. Godley stated that the licensee was re-baselining the entire electrical distribution system and NRC involvement may be needed to review switchyard modifications.

Mr. Godley discussed the NRC performance assessment process with the new inspection program. The NRC data was predicated on 1 year's worth of data for analysis. The licensee requested that they not be included in the new inspection program since there would be no meaningful operating data. The licensee discussed this issue with personnel at the Nuclear Engineering Institute, which from the NRC's perspective was the correct course of action. The NRC took action to respond to the licensee on this request. Mr. Godley also stated that they will request that the update to the Final Safety Analysis Report that is due 30 days after restart of the first unit be delayed for 6 months. The reason was there is a significant number of changes.

Mr. Godley also requested clarification of the following statement taken from minutes from a July 9, 1998, public meeting: "The NRC requested and you [licensee] committed to provide the NRC with documentation for any operability or safety evaluations completed prior to plant startup." The NRC stated that this commitment was no longer necessary. The licensee agreed to make available for NRC review any operability or safety evaluation requested by NRC.

Mr. Pollock discussed performance indicators and the closure process for Performance Assurance department oversight activities. In addition, Mr. Pollock discussed performance in the engineering, operations, maintenance, and plant support departments. Specific items discussed included review of a Sargent and Lundy calculation assessment report, follow up on

significant findings from the Expanded System Readiness Reviews, and Restart Action Plan root cause and corrective actions.

Mr. Noonan discussed the vision of the Operations Department, which involved safety consciousness, leadership, knowledge and skills, and a self-critical organization. Mr. Noonan also discussed the plant transition to operations, including the sequence of events for turnover of systems to Operations Department personnel. This entailed:

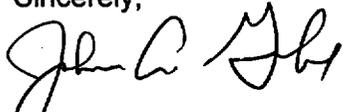
- Verifying field work complete
- Postmaintenance and postmodification tests performed
- Paperwork complete
- System walkdowns complete
- Clearances reviewed
- System engineering final readiness report complete
- Enhanced system readiness review report complete.

Mr. Noonan stated that around-the-clock coverage would be provided by departmental level managers through entry into Mode 4 (Hot Standby).

Mr. Broadwater discussed modification installation and testing, including the restart and power ascension testing program. Mr. Broadwater stated that the installation and test program would incorporate the best practices and lessons learned from the Salem Nuclear Plant, which experienced a similar restart effort. Mr. Broadwater stated that the key program elements included test phases at the component level, system level, integrated function level, and the power ascension level. The startup support team would consist of the shift plant manager, the shift engineering support manager, the modification installation and testing manager, and the shift test engineer.

Mr. Bakken closed the licensee's presentation with a discussion of the status of key activities. This included the ice condenser, the corrective action program, and the emergency operating procedures upgrades. Finally, Mr Bakken discussed the next steps toward restart, which included closeout of the Confirmatory Action Letter and safe completion of work for restart with quality results.

Sincerely,



John A. Grobe, Director  
Division of Reactor Safety

Docket Nos. 50-315; 50-316  
License Nos. DPR-58; DPR-74

Enclosures: 1. List of Meeting Attendees  
2. Licensee's Slide Presentation

See Attached Distribution

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- Paperwork complete
- System walkdowns complete
- Clearances reviewed
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Mr. Bakken closed the licensee's presentation with a discussion of the status of key activities. This included the ice condenser, the corrective action program, and the emergency operating procedures upgrades. Finally, Mr Bakken discussed the next steps toward restart, which included closeout of the Confirmatory Action Letter and safe completion of work for restart with quality results.

Sincerely,

/s/ J. Grobe

John A. Grobe, Director  
Division of Reactor Safety

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See Attached Distribution

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OFFICE	RIII	E	RIII	NRR	RIII			
NAME	Passehl:dp	dp	Veget	dp/fer	Craig	(D)	Grobe	
DATE	12/28/99		12/28/99		12/28/99		12/19/00	

October 28, 1999, Meeting Attendees List

NRC

Bruce Bartlett, SRI D. C. Cook  
Kevin Coyne, RI D. C. Cook  
Claudia Craig, Section Chief, PD-III, DLPM, NRR  
Marty Farber, Senior Reactor Inspector, Division of Reactor Safety  
Jack Grobe, Director, Division of Reactor Safety  
Dave Passehl, Project Engineer, Division of Reactor Projects  
John Stang, Project Manager, NRR  
John Zwolinski, Director, Division of Licensing and Project Management, NRR

AEP

Chris Bakken, Site VP  
Joseph Broadwater, Manager, Modification Installation and Testing  
Thomas A. Craig, Operations  
Julie Cunningham, Nuclear Financial Documents  
Rob W. Gaston, Regulatory Affairs  
Robert C. Godley, Director Regulatory Affairs  
Gary Harland, Manager, Outage/Work Control  
David W. Jenkins, Legal Department, Others  
Wayne Kropp, Performance Assurance  
James F. Labis, Environmental Compliance  
Mark Marano, Dir. Business Services  
Richard Meister, Regulatory Affairs  
Joseph E. Pollock, Director, Performance Assurance  
Tom Quaka, Nuclear Safety Assessment  
Mike Rencheck, VP Engineering  
John R. Sampson, President Indiana and Michigan Power  
Keith Steinmetz, Regulatory Affairs  
Lanny Thornsbury, Systems Engineering Manager  
Barry Wallace, Training Manager  
Larry Weber, Operations Manager

Others

Peter A. Moeller, Consultant  
Thomas P. Noonan, Plant Mgr./Restart Dir.  
Perry Robinson, Hopkins & Sutter  
Dan Salter, HGP, Inc.

*Use for reference  
Mishawaka*



# Nuclear Generation Group

Restarting D. C. Cook  
October 28, 1999

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POWER**  
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# American Electric Power

Meeting with

# Nuclear Regulatory Commission

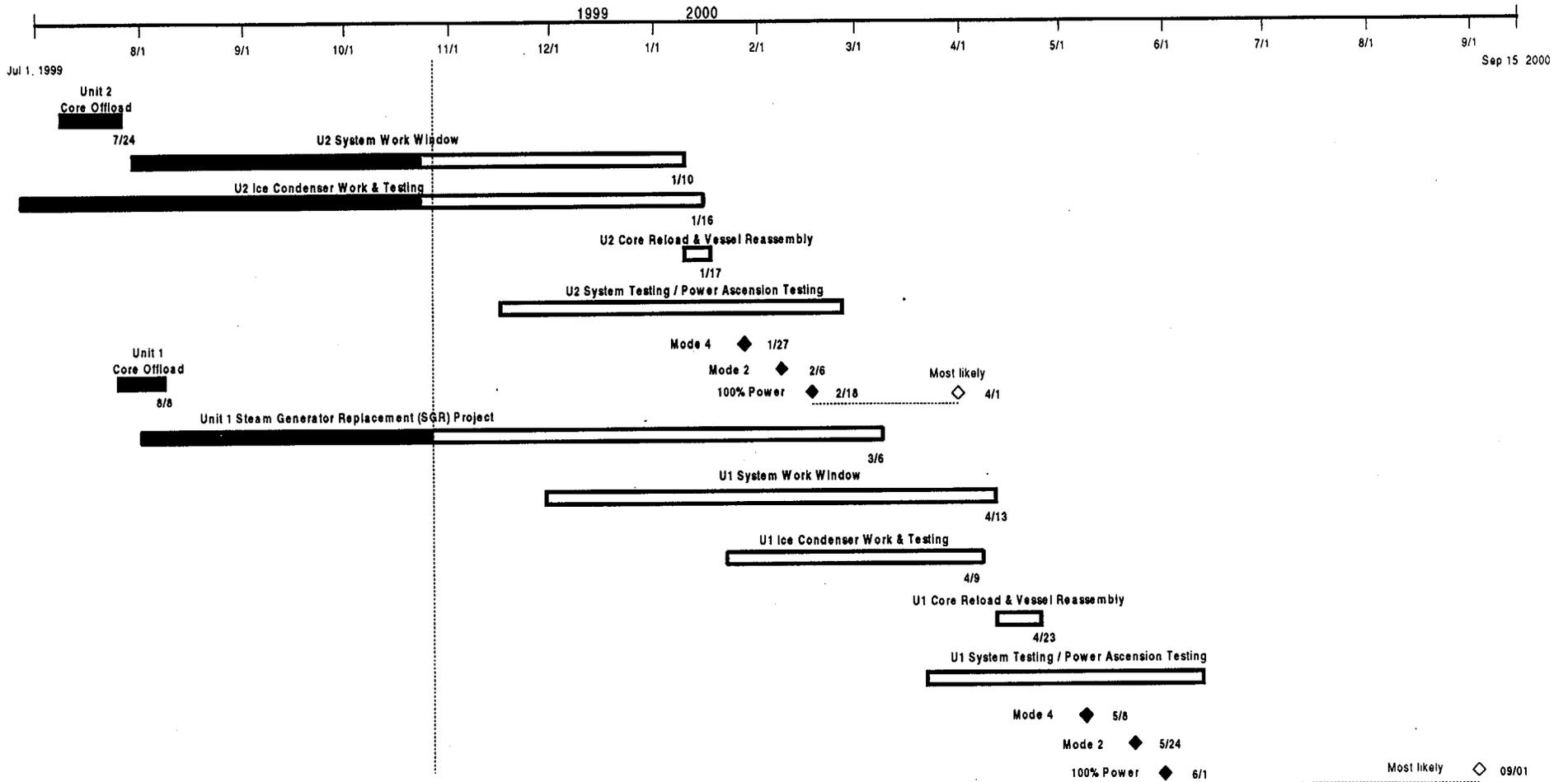
Restarting D. C. Cook  
October 28, 1999

# Agenda

- 
- |  |                   |
|--|-------------------|
| ■ Introduction                                 | Chris Bakken      |
| ■ Schedule Status                              | Gary Harland      |
| ■ Regulatory Activities                        | Robert Godley     |
| ■ Oversight Activities                         | Joseph Pollock    |
| ■ Transition to Operations                     | Tom Noonan        |
| ■ Restart & Power Ascension<br>Testing Program | Joseph Broadwater |
| ■ Wrap-up                                      | Chris Bakken      |

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# Current Status - Overall Project



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# *Schedule Status*

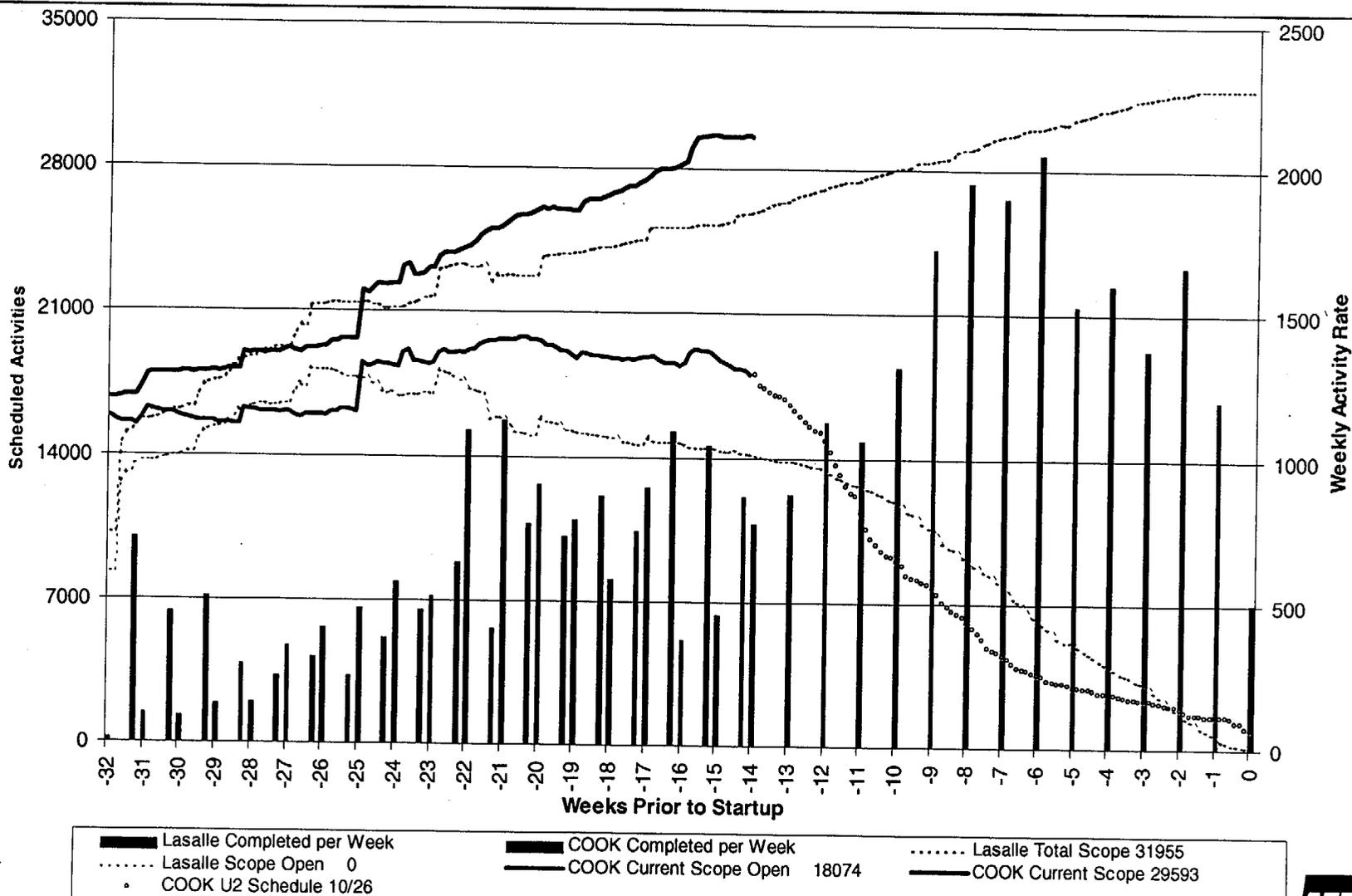
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**Gary Harland**

**Director - Work Control**

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# Schedule Progress



# Status of Plant Modifications

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■ Total Discovery Modifications	272
■ Screened Out	-31
■ Post Restart	<u>-23</u>
■ Actual / Potential Modifications	218

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■ Delivered to Field	54
■ Currently Scheduled	73
■ Schedules Needed - Major	17
■ Schedules Needed - Minor	16
■ On Hold	<u>9</u>
	169

■ Re-evaluations	<u>49</u>
	218

# Current Status - Summary

## ■ Challenges

- Engineering Deliverables
- Schedule Adherence
- Doing It Right the First Time

## ■ Potential Schedule Effects

◀ **February 6th - Mode 2 Target** ▶

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# *Regulatory Activities*

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**Robert Godley**

**Director - Regulatory Affairs**

# Closure of the Confirmatory Action Letter

## Confirmatory Action Letter

Future Closure(s)  
Issues 1, 4\*, 7, and 9\*

Confirm Closure of  
Issues 3 and 8

October 25th Submittal

Confirmed Closure of  
Issues 2, 5 and 6

### CAL Issues:

1. Recirculation Sump Inventory
2. Recirculation Sump Venting
3. 36 Hour Cooldown with One Train of Cooling
4. Switchover to Recirculation Sump
5. Compressed Air Overpressure
6. Residual Heat Removal Suction Valve Interlock
7. Fibrous Material
8. Refueling Water Storage Tank Mini-flow Recirculation Lines
9. Instrument Uncertainties

\* Currently in  
0350 Process

# RESTART ACTION PLAN (RAP) PROGRESS AND PERFORMANCE CHART

## 0350 RESTART ISSUES

027-65

0350 Item	RAP Development & Approval							U2 RAP Work Activity Progress				U2 RAP Closure Packages					PA	NRC Inspection	
	Accountable Managers	Condition Report (CR)		Restart Action Plan (RAP)			SMRT Approval	In Integrated Schedule?	Scheduled Activities % Complete	CPs with Compliance/CPs Total	Closure Package (CP) % Complete				Assessment Completed	Inspection Date(s)	IR Nos / % Complete		
		RCA	CARB	Owner Org	Req Compl	SRRB					0	25	50	75				100	
1 A-E	D. Crouch / C. Gilmer / J. Schrader	98-1141 98-1130	7/14/99	10/4/99	10/6/99	10/7/99	10/19/99T	Yes	No	0	25	60	75	100	5/63	9	< 11/15/99	11/23-11/27	
2	M. Danford / C. Huenimann / A. Silakoski	97-3360	9/15/99	9/17/99	9/17/99	9/17/99	9/22/99	Yes	No	76					0/8	0	< 8/10/99	8/20/99	98024
3	S. Farlow / W. Eiert	99-0554	9/8/99	10/12/99	10/12/99	10/13/99	10/15/99	Yes	No	95					0/33	0	< 11/16/99	11/23-12/7	
4	R. Godley / R. Cassal	98-5335	8/25/99	9/21/99	9/20/99	9/21/99	9/21/99	Yes	No	96					0/6	0	< 9/19/99	9/12/99	98023
5	B. Wallace / W. Nelson	98-5687	4/20/99	7/10/99	8/19/99	8/25/99	N/A	Yes	No	100					8/8	100	N/A	11/16/99	98023 C-0840
6	D. Haler / E. Young / J. Allard / P. Schoepf	98-5687	4/20/99	7/10/99	8/19/99	8/25/99	N/A	Yes	No	100					8/8	100	N/A	11/16/99	98023 C-0840
7	K. Riches / J. Pollock / J. Gelston	98-5687	4/20/99	7/10/99	8/19/99	8/25/99	N/A	Yes	No	100					8/6	100	N/A	11/16/99	98023 C-0840
8	L. Thernberry / J. Sankey	98-5687	4/20/99	7/10/99	8/19/99	8/25/99	N/A	Yes	No	100					8/6	100	N/A	11/16/99	98023 C-0840
9	L. Thernberry / J. Sankey	98-5687	4/20/99	7/10/99	8/19/99	8/25/99	N/A	Yes	No	100					8/6	100	N/A	11/16/99	98016 C-0840
10	L. Thernberry / J. Gebbe	98-4226	10/5/99	8/5/99	8/12/99	10/19/99	10/19/99	Yes	No	94					0/10	0	< 11/16/99	11/23-12/7	
11	L. Thernberry / J. Gebbe	97-2425	9/15/99	9/23/99	9/23/99	9/23/99	10/5/99	Yes	No	93					8/12	67	10/1/99	11/23-12/7	
12	J. Glass / S. Chakrabarti	99-18478	10/7/99	10/7/99	10/29/99	10/29/99	10/14/99	Yes	No	72					0/12	0	< 11/16/99	11/23-12/7	
13	S. Lacey / L. Thernberry	N/A	N/A	8/11/99	8/11/99	8/20/99	10/15/99	Yes	No	56					0/13	0	< 9/23/99	9/17-99	98002 3 & 7 C-0840
14	G. Harland / D. Crouch	N/A	N/A	9/2/99	9/2/99	9/19/99	10/5/99	Yes	No	90					7/16	47	9/24/99	9/17-99	98013 C-0840
15	T. Hansen / L. Weber	N/A	N/A	9/2/99	9/2/99	9/19/99	10/5/99	Yes	No	90					6/12	42	9/24/99	9/17-99	98013 C-0840
16	D. Se / R. Withrow	99-4150	9/17/99	9/19/99	9/19/99	9/19/99	11/2/99	Yes	No	56					0/11	0	< 11/16/99	11/23-12/7	

A - Approved/Complete   
 C - Approved with Comments   
 S - Scheduled Review Date   
 T - Tabled / Overdue   
 GP - Completed as Green Package   
 < - Complete Before This Date

1. Programmatic Breakdown in Surveillance Testing
  - A. Inadequate Instructions in Surveillance Tests
  - B. Acceptance Criterion Lack Sufficient Margin to Analysis Limit
  - C. Failure to Meet Technical Specification Requirements
  - D. Preconditioning of Equipment Prior to Surveillance Testing
  - E. Failure to Assess and Control the Quality of Contractors Performing Surveillance Testing
2. Corrective Action Program Breakdown
3. Programmatic Breakdown in the Maint. of the Design Basis
  - A. Inadequate Design Control
  - B. Failure to Update UFSAR
  - C. Failure to Consider Instrument Uncertainties
  - D. Consideration of System/Component Failure Modes

4. Safety Evaluations
  5. Operator Training Issues
  6. Resolution of Low Condenser Issues
  7. Resolution of Non-Safety Related Cables Going to Shunt Trip Coils
  8. Resolution of Hydrogen Recombiner Operability Issues
  9. Resolution of Distributed Ignition Technical Specification Issue
  10. Resolution of Containment Spray System Operability Issues
  11. Resolution of Hydrogen Mitigation System Operability and Mat'l Condition Issues
  12. Resolution of Containment Liner Pitting
  13. Systems and Containment Readiness Assessments

14. Programmatic Readiness Assessment
  - A. Programmatic Problem Discovery
  - B. Contractor Control Program
  - C. Preventive Maintenance Program
  - D. Emergency Operating Procedures Program
  - E. Electrical Protection Coordination Including Fuse/Breaker Control Program
  - F. Operability Determination Program
  - G. Programmatic Final Readiness Reviews
15. Functional Area Readiness Assessment
16. Resolution of Operability of MOVs in the GL 89-10 Program

# Key Licensing Activities - License Changes

#	Subject	Unit(s)	Final Inputs to Licensing	Submittal Drafted	PORC Meeting	NSDRC Meeting	NRC Submittal Date	NRC RAI	AEP Response to RAI	NRC Approval/Concurrence Required By	Mode Constraint	Licensing Lead(s)
1	Rod Insertion - Switchover USQ	1&2	Complete	Complete	Complete	Complete	9/17/99	10/20/99	11/1/99	12/2/99	Mode 3	Raleigh
2	Post Accident Containment Sump Inventory Issues (Sump Level, RWST Volume, Ice Mass & Melt Rate) - Cal Item #1	1&2	Complete	Complete	Complete	Complete	10/1/99	10/27/99	11/10/99	12/13/99	Mode 4	Wadkins
3	Containment Spray Pump/ Spray Additive Flow Surveillance Change to Standard Tech Spec	1&2	Complete	Complete	Complete	Complete	10/12/99	11/1/99	11/15/99	12/10/99	Mode 4	Cribbe
4	Under Voltage Set Point Changes - Methodology, Scope, and Amendment Request - Phase I	2	Complete	Complete	10/29/99	11/5/99	11/9/99	TBD	TBD	12/20/99	Mode 4	Kohler
	Under Voltage Set Point Changes - Final Calculations and Value - Phase II		Draft 10/28/99 Final 11/11/99	11/8/99	11/12/99	11/17/99	11/22/99	TBD	TBD			
5	Accumulator Isolation Valve Breaker Rackout	1&2	Complete	Complete	Complete	Complete	11/1/99	TBD	TBD	TBD	Mode 3	Rhodes
<b>UNIT 1 Steam Generator Repair Project Related</b>												
6	Heavy Loads (SGRP)	1	Complete	Complete	Complete	Complete	9/23/99	10/18/99	11/1/99	12/7/99	Movement of SG Loads	Inserra/Till
7	RCS Chemistry Sampling in Modes 5 & 6	1&2	Complete	Complete	Complete	Complete	9/10/99	10/11/99	10/25/99	11/22/99	RCS Pipe Cuts on Unit 1	Haggerty
8	ZIRLO Fuel Cladding Amendment	1	Complete	Complete	Complete	Complete	11/1/99	11/15/99	11/29/99	2/15/99	Receipt of New Fuel	Wadkins
9	RCS Volume - SGRP (A standard Tech Spec Change is being prepared to eliminate RCS Volume in Section 5 and the need for this submittal)	1&2	12/17/99	1/6/00	1/14/00	1/19/00	1/25/00	2/24/00	3/10/00	3/23/00	Mode 4	Inserra/Till

# *Next Steps*

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- **Potential Issues**
- **NRC Performance Assessment Process**
- **FSAR Update**

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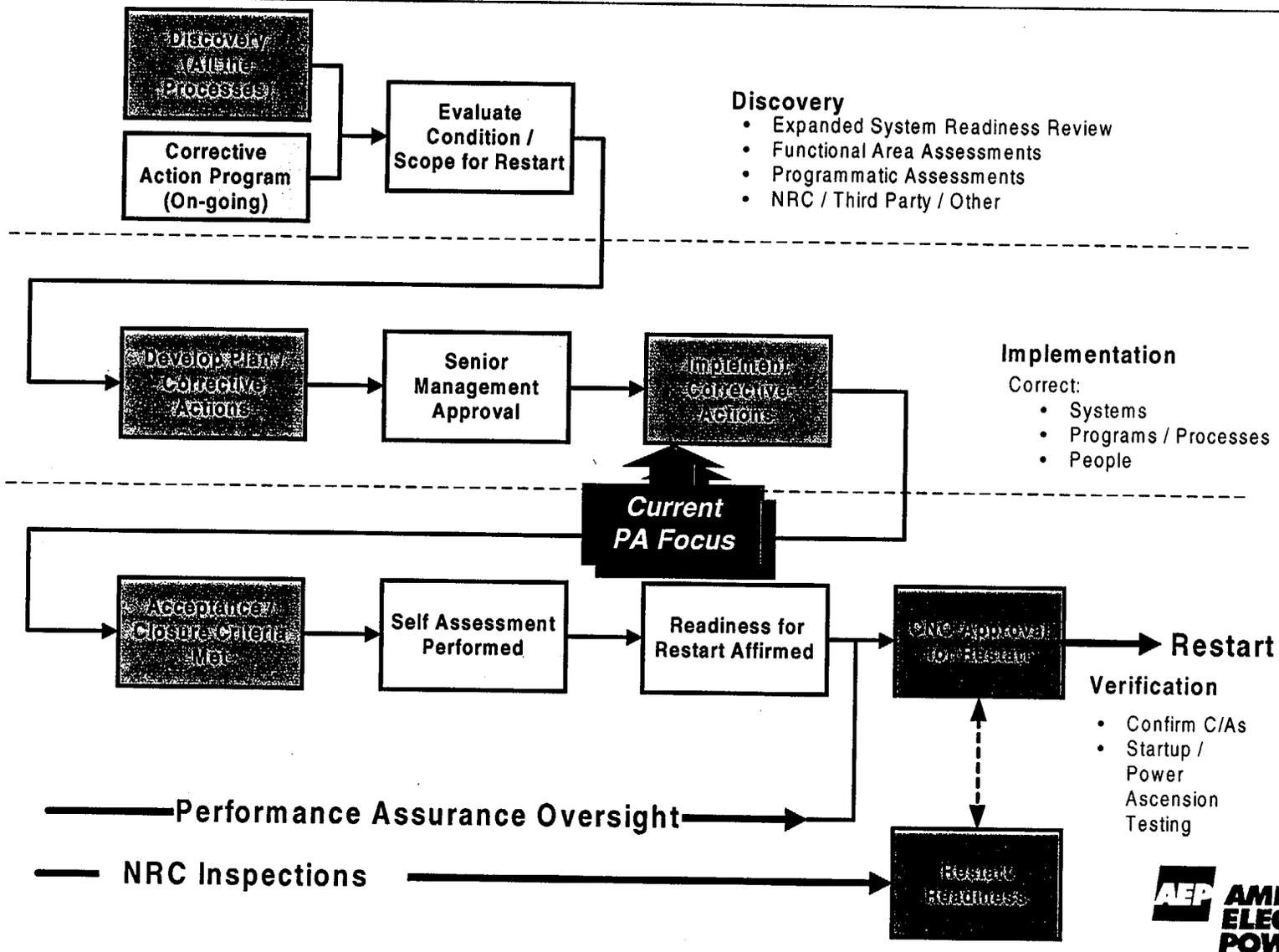
# *Startup & Test Program*

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**Joseph Pollock**

**Director - Performance Assurance**

# Closure Process - Oversight Activities



# Performance Indicators

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**G**

**Excellent**

**Y**

**Meets Standards**

**R**

**Needs Improvement**

**W**

**No Data Available**

# Departmental Performance - Engineering

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- **Sargent & Lundy Calculation Assessment Report**
- **Follow-up on Significant ESRR Findings**
- **Specific 0350 Hardware Issues**

# Departmental Performance - Operations

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- Clearance Program
  
- EOP Verification and Validation
  
- Conduct of Operations Activities
  
- Operability Determinations

# Departmental Performance - Maintenance

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- **Contractor Control**

- **Work Practices**

- **Implementation of On-line Work Control Process**

# Departmental Performance - Plant Support

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- **Corrective Action Program**

- **Fitness For Duty**

- **Emergency Planning**

# Departmental Performance - Transition to Operations

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- **Increased Field and Control Room Observations**
- **System Turnover**
- **Mode Change Assessments**

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# *Transition to Operations*

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**Tom Noonan**

**Restart Director**

# *Operations: Vision*

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- **Safety Consciousness**
- **Operations Leadership**
- **Self-Critical Organization**
- **High Level of Knowledge & Skills**

◀ ***Operations Stands for Safety*** ▶

# Transition to Operations - People

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- **Human Performance**
- **Skills Development**
- **Knowledge & Use of Procedures / Processes**

# *Transition to Operations Leadership*

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- **Operations Setting the Standards**
- **Organizational Structure Developed**
- **Integrated Resource Loaded Schedule**

# *System Turnover to Operations - Sequence of Events*

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- **Assigned Restart Unit 2 Items to Owners**
- **Completing the Work**
- **Testing the Equipment**
- **Documenting the Results**
- **Turning Over to Operations**

# *Operations Leading Plant Restart*

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- **Readying the Plant for Operations**
- **Completing the Training**
- **Affirming the Systems & People for Restart**
- **Establishing Management Oversight**
- **Monitoring for Results**

◀ ***Operations Will Be Ready  
To Lead The Way*** ▶

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COOK NUCLEAR PLANT

# *Restart And Power Ascension Testing Program*

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**Joseph Broadwater**

**Modification Installation and Testing  
Manager**

# *Restart And Power Ascension Testing Program*

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- **Key Program Elements**
- **Program Scope**
- **Implementation Phase**

◀ ***Safe, Controlled and Deliberate  
Restart of D. C. Cook Unit 2*** ▶

# Key Program Elements

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- **System Readiness Review Board (SRRB) Approved Concept**
- **Proceduralized in the Startup And Power Ascension Testing Program**
- **Test Review Board (TRB) Established**
- **Test Phases**

# Program Scope

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- **System Test Plan Development & Content**
  - **Table 1 : Matrix of DCPs**
  - **Table 2 : Matrix of Job Orders (JO)**
  - **Table 3 : Industry Experience and Commitments**
  - **Table 4 : Additional Testing /Restart and Power Ascension Testing**

# Program Scope (cont.)

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- **Summary : Why The System Is Ready For Startup**
- **System Test Plan Review And Approval**
- **Test Review Board Charter**
- **Test Review Board Members**

# Implementation Phase

- **Program Management And Support Organization**
- **Startup Support Team**
  - Shift Plant Manager
  - Shift Engineering Support Manager
  - Modification Installation and Testing Manager
  - Shift Test Engineer
- **Startup & Power Ascension Sequencing Procedure**

◀ ***Safe, Controlled and Deliberate  
Restart of D. C. Cook Unit 2*** ▶

*Doing it right ...  
Every step of the way.*  
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# *Wrap-up*

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**Chris Bakken**

**Site Vice President**

# *Status of Key Activities*

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- **Ice Condenser**
- **Corrective Action Program**
- **Emergency Operating Procedures**

# Next Steps

- **Close the Confirmatory Action Letter**
- **Safely Complete the Restart-required Work**
- **Assure Quality Results**
- **Seek the Regional Administrator's Concurrence for Restart**

◀ ***Safe and Effective Restart of Unit 2 -  
1st Quarter 2000*** ▶



*Doing it right ...*

*Every step of the way.*

COOK NUCLEAR PLANT

R. Powers

-4-

cc w/encl: A. C. Bakken III, Site Vice President  
T. Noonan, Plant Manager  
M. Rencheck, Vice President, Nuclear Engineering  
R. Whale, Michigan Public Service Commission  
Michigan Department of Environmental Quality  
Emergency Management Division  
MI Department of State Police  
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