

April 20, 2000

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

SUBJECT: TRANSITION OF D. C. COOK TO THE REVISED REACTOR OVERSIGHT
PROCESS

Dear Mr. Powers:

On March 10, 2000, Mr. Chris Bakken and other members of your staff met with members of the NRC staff to continue our discussion regarding transition of D. C. Cook to the Revised Reactor Oversight Process (RROP) and the Risk Informed Baseline Inspection Program (RIBIP) following our earlier meeting on February 15, 2000. This letter summarizes the March 10 meeting and documents the plans developed to transition D. C. Cook to the new oversight process and inspection program.

NRC representatives indicated that the RROP and RIBIP would be implemented for Units 1 and 2 at D. C. Cook upon the restart of Unit 2, scheduled for late spring of 2000. Unit 1 is currently scheduled to restart in the fall of 2000. The baseline inspection program would be augmented in those areas where Performance Indicator (PI) data is not available or where the data is determined to be unreliable. During the meeting NRC representatives presented a preliminary inspection plan that would cover approximately a one year period following Unit 2 restart. The inspection plan would result in approximately 1400 hours of additional inspection effort, primarily to gain insights in those areas where PI data is not available. NRC representatives stated that this is an inspection hour estimate and may be refined, depending upon the availability and reliability of PI data. Also, NRC representatives indicated that the Significance Determination Process (SDP) would be utilized to evaluate inspection findings and the Action Matrix would be considered in determining necessary NRC follow up actions. In addition, consistent with NRC and licensee staff desires, the NRC intends on documenting inspection findings in accordance with the revised Manual Chapter 0610 guidance, with one exception. Inspection reports developed and issued through the restart of Unit 1 will contain additional inspection detail to facilitate the communication of facility performance and Unit 1 restart related issues to the public and licensee.

Mr. Bakken outlined American Electric Power's (AEP) plans for submittal of PI data regarding D. C. Cook. Mr. Bakken stated historical PI data would be provided in those areas where it is available and reliable. Those areas include most of the Emergency Preparedness PI's, and the Public Radiation Safety and Safeguards PI's. Going-forward PI data collection would occur in most areas by Unit 2 startup with the remaining PI data collection occurring within two quarters of Unit 2 restart. PI data would be reported by AEP during the first quarter following Unit 2 restart in the following areas: Unplanned Scrams; Reactor Coolant System (RCS) Activity; RCS Leakage; Drill/Exercise Performance; Emergency Response Organization Drill Participation;

Alert and Notification System; Occupational Exposure Control Effectiveness; Radiological Effluents; Protected Area Equipment; Personnel Screening Program; and Fitness-For-Duty/Personnel Reliability Program. Data in the remaining PIs would be submitted approximately six months following Unit 2 restart.

While AEP would begin to submit PI data shortly after restart of Unit 2, that data would be collected and submitted under interim procedures. Mr. Bakken indicated that D. C. Cook would complete development of the final infrastructure necessary to collect, validate and report PI data over a six month period following restart. He stated that in order for AEP to go forward with the transition plan described above, AEP requests enforcement discretion regarding 10 CFR 50.9 during the six month period the final infrastructure is being developed.

At the conclusion of the meeting, NRC representatives indicated that the issue regarding enforcement discretion relative to 10 CFR 50.9 would have to be discussed within the Agency.

Subsequent to the meeting, the Commission approved SECY-00-0061, which revised the NRC's Enforcement Policy. This revision to the Policy provides for continued use of discretion for inaccurate or incomplete PI data until January 31, 2001. Therefore, discretion will be applied to D. C. Cook for non-willful violations of 10 CFR 50.9 upon entry into the RROP and until January 31, 2001.

If you have any questions regarding this letter please do not hesitate to contact me.

Sincerely,

/RA/

John A. Grobe, Director
Division of Reactor Safety

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

Enclosures: 1. Licensee Handout
2. Attendance List

See Attached Distribution

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John A. Grobe, Director
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R. Powers

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cc w/encls: A. C. Bakken III, Site Vice President
J. Pollock, 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
D. Lochbaum, Union of Concerned Scientists

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D. C. COOK PUBLIC MEETING
FRIDAY, MARCH 10, 2000

NAMES	ORGANIZATION
David Passehl	NRC RIII Project Engineer
Anton Vogel	NRC RIII Branch Chief, Branch 6
Gary Shear	NRC RIII Branch Chief, DRS
John Grobe	NRC RIII Director, DRS
Bruce Bartlett	NRC RIII Senior Resident
Dan Salter	HGP, Inc.
Sonia Burgess	NRC RIII Senior Reactor Analyst
Roland Lickus	NRC - RIII
Gordan Arent	AEP, Cook Nuclear Plant, Reg. Affairs
Robert Godley	AEP, Director, Reg. Affairs
Chris Bakken	AEP, Site Vice President
Bob Temple	Hopkins & Sutter