

August 15, 2000

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

SUBJECT: INSPECTION PLANS UNDER THE REVISED REACTOR OVERSIGHT
PROCESS

Dear Mr. Powers:

The purpose of this letter is to inform you of our planned inspections at your facility to implement the Revised Reactor Oversight Process and the Risk-Informed Baseline Inspection Program at D.C. Cook. Implementation of the Revised Reactor Oversight Process and the Risk-Informed Baseline Inspection Program was delayed until following restart of Unit 2. This information was previously discussed with you in our March 10, 2000, public meeting, and documented in a letter dated April 20, 2000.

During the March 10, 2000, meeting, NRC representatives indicated that the baseline inspection program would be augmented in those areas where Performance Indicator (PI) data was not available or insufficient to provide the necessary insight into plant safety performance. Also, a preliminary inspection plan that covered approximately a one year period following Unit 2 restart was discussed with your staff. During these discussions we indicated that the Significance Determination Process would be utilized to evaluate inspection findings and that the Action Matrix would be considered by the NRC Inspection Manual Chapter 0350 Oversight Panel when determining necessary NRC followup actions.

As described in a letter to you dated June 13, 2000, the NRC Inspection Manual Chapter 0350 Oversight Panel concluded that your staff's performance improvement initiatives were sufficiently effective to support the restart of D.C. Cook Unit 2. However, the Panel concluded that inspections beyond the baseline program will be necessary through the restart of Unit 1, due to the lack of PI data providing insight into Unit 2 operations, and to provide necessary assessment of Unit 1 readiness for restart and the adequacy of long term corrective actions. The Panel will routinely assess plant performance and operating experience, evaluate the continuing need for augmented inspection, and recommend when NRC oversight can return to the routine inspection program.

In developing the inspection plan for D.C. Cook the NRC staff considered the availability of performance indicators in each of the strategic performance areas. In addition, the NRC staff considered the additional inspections that may be warranted to adequately assess the restart readiness of Unit 1, and evaluate the adequacy of long term corrective actions initiated during the extended outage. Consequently, in the Reactor Safety strategic performance area,

we intend to expand the level of oversight by taking a larger sample of activities in the Initiating Events, Mitigating Systems, and Barrier Integrity cornerstones. Examples of baseline inspections that will be augmented include emergent work, equipment alignment, maintenance rule, non-routine evolutions, operability evaluations, operator workarounds, surveillance testing, post maintenance testing, refueling outage activities, and permanent plant modifications. The permanent plant modification inspection will be augmented by both resident and region-based inspectors, and will include a review of modifications necessary prior to restart of Unit 1, in addition to a sampling of safety evaluations. The NRC Inspection Manual Chapter 0350 Oversight Panel previously determined that this inspection would be performed to ensure the effectiveness of corrective actions pertaining to design and licensing basis control. Regarding inspections in the Emergency Preparedness cornerstone, these will be augmented by our Region-based inspectors due to insufficient drill/exercise performance indicator data.

Inspections in the Radiation Safety, and Safeguards strategic performance areas have also been adjusted. Inspections associated with the Occupational and Public Radiation Safety cornerstones will be augmented to provide confidence in your operational health physics programs and practices following the extended shutdown of the plant. Inspections under the Physical Protection cornerstone will not be augmented since the performance indicators for protected area equipment, personnel screening, and fitness-for-duty are considered valid.

In addition to the inspections discussed above, a restart readiness assessment will be performed just prior to the restart of Unit 1 to assess operational readiness of the unit and to assess the organization's readiness for dual unit operations. Also, an inspection of motor-operated valves will be performed to complete our assessment of the program established to address the capabilities of motor-operated valves per the guidance of Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance."

Enclosure 1 lists our planned inspections for the period July 2000 through March 2001 at D.C. Cook to allow you to resolve scheduling conflicts and personnel availability issues in advance of our inspectors' arrival onsite. The inspections scheduled for later in the period are more tentative and may be adjusted in the future due to emergent issues at D.C. Cook or other Region III facilities.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response if you choose to respond, will be placed in the NRC Public Electronic Reading Room (PERR) link at the NRC homepage, namely <http://www.nrc.gov/NRC/ADAMS/index.html>.

R. Powers

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We will inform you of any changes to the inspection plan. If you have any questions, please contact me at 630-829-9700.

Sincerely,

/RA/

John A. Grobe, Director
Division of Reactor Safety

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

Enclosure: D.C. Cook Inspection/Activity Plan

cc w/encl: A. C. Bakken III, Site Vice President
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