

April 23, 1999

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

SUBJECT: NRC INSPECTION REPORT 50-315/99003(DRS); 50-316/99003(DRS)

Dear Mr. Powers:

On March 26, 1999, the NRC completed a special inspection conducted at your Buchanan Michigan Corporate facility. This inspection was an examination of activities under your license as they relate to your implementation of the Expanded System Readiness Review (ESRR) program at your D. C. Cook Units 1 and 2 reactor facilities. The NRC understands that these reviews are intended to identify design and materiel condition issues that will require resolution before restart to provide assurance that safety-related plant systems fulfill their design basis safety functions. Effective implementation of the ESRR process will address portions of Case Specific Checklist Items No. 3, "Programmatic Breakdown in the Maintenance of the Design Basis," and No. 13, "Systems and Containment Readiness Assessment," that were established through the NRC's Manual Chapter 0350, "Staff Guidelines for Restart Approval." The NRC will continue to monitor and assess the effectiveness of the problem identification phase of your system readiness evaluations. The enclosed report documents the results of this inspection.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, and interviews with personnel. At the conclusion of the inspection, the findings were discussed with you and members of your staff.

Overall, the initial implementation of the ESRR process was effective. Significant programmatic issues and technical concerns have been identified by the ESRR teams, including cable separation concerns, seismic mounting deficiencies, and spray header obstructions. Management has maintained active oversight of the ESRR process through the System Readiness Review Board. This oversight function has addressed the technical rigor and consistency of the individual ESRR team products.

Several system walkdowns by the ESRR teams were observed by NRC staff to have identified design and configuration deficiencies and were effective. Most ESSR teams performed walkdowns using comprehensive checklists to verify design parameters; however, we observed specific walkdowns that initially appeared to focus more on materiel conditions and did not verify certain design parameters. The specific walkdown weaknesses were subsequently addressed by your staff.

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Based on the large number of condition reports being initiated, the threshold for identifying and documenting problems appeared conservatively low. Some problems were noted where condition report information was either incorrect or missing in the new computerized database and where the condition reports had limited or incorrect descriptions of the issue or did not consider design requirements. While we recognize that the electronic corrective action program (ECAP) is early in its implementation, these issues represent a continuing challenge in the proper categorization and resolution of the problems identified by the ESRR process, and warrant continuing management oversight to assure effective ECAP implementation.

In accordance with 10 CFR 2.790 of the NRC'S "Rules of Practice," a copy of this letter, the enclosure, and your response to this letter, if you choose to provide one, will be placed in the NRC Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Original /s/ John A. Grobe

John A. Grobe, Director
Division of Reactor Safety

Docket Nos. 50-315; 316
License No. DPR-58; DPR-74

Enclosure: Inspection Report 50-315/99003(DRS); 50-316/99003(DRS)

cc w/encl: A. C. Bakken III, Site Vice President
M. Rencheck, Vice President, Nuclear Engineering
D. Cooper, Plant Manager
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

See Attached Distribution

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