

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

May 14, 1999

EA 99-116

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

SUBJECT: D. C. COOK INSPECTION REPORT 50-315/99004(DRP); 50-316/99004(DRP)

Dear Mr. Powers:

On April 16, 1999, the NRC completed an inspection at your D. C. Cook Units 1 and 2 reactor facilities. The inspection was an examination of activities conducted under your license as they relate to compliance with the Commission rules and regulations and with the conditions of your license. Areas reviewed included Operations, Maintenance, Engineering, and Plant Support. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations of activities in progress. The enclosed report presents the results of that inspection.

During this inspection period, we noted examples where operators demonstrated a conservative decision-making philosophy. We also observed that maintenance activities were generally performed in accordance with approved procedures and utilized appropriate radiological protection practices. In addition, we noted that plant maintenance and engineering personnel expanded the scope of problem investigations, where appropriate, to include other equipment and programs related to the failed equipment. A particularly noteworthy example was the decision to promptly inspect all 4 kilovolt breakers following the identification of a loose anti-shock spring in a 4 kilovolt breaker.

In contrast to the improving performance described above, continuing problems were identified with the corrective action program, the adequacy of maintenance and surveillance test procedures, and the performance of required safety evaluations. In addition, you did not recognize that changes in the reactor coolant system temperature also resulted in reactivity changes until prompted by NRC inspectors. Consequently, you did not know if you had operated the facility in compliance with your Technical Specifications until you subsequently performed a detailed engineering evaluation of several evolutions which had the potential to add positive reactivity. We also noted that your procedural controls on the usage of overtime were weak which resulted in your staff having a difficult time evaluating your overtime usage. Your continued attention in these areas appears warranted.

Based on the results of this inspection, the NRC has determined that four violations of NRC requirements occurred. The first violation, which was identified by your staff, involved three safety-related surveillance test procedures for the centrifugal charging pumps that contained inadequate instructions to operate the pumps safely due to deficiencies in the procedure

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revision process. The second violation, which was identified by NRC inspectors, involved two examples of condition reports that were inappropriately categorized as conditions adverse to quality rather than as significant conditions adverse to quality. The third violation, which was identified by NRC inspectors, involved the failure to perform a 10 CFR Part 50.59 safety evaluation for a procedure change. The fourth violation resulted from review of a 1996 event report. That violation was identified by your staff and involved the failure to follow the appropriate Technical Specification Limiting Condition for Operation Action Statement for an inoperable pressurizer power operated relief valve.

These Severity Level IV violations are being treated as Non-Cited Violations (NCVs). Appendix C of the Enforcement Policy requires that for Severity Level IV violations to be dispositioned as NCVs, they be appropriately placed in the licensee's corrective action program. Implicit in that requirement is that the corrective action program be fully acceptable. The D. C. Cook Plant corrective action program was not adequate and has been the focus of significant attention by your staff to improve the program. While your staff and the NRC have not yet concluded that the corrective action program is fully effective, the corrective action program improvement efforts are underway and captured in the D. C. Cook Restart Plan which is under the formal oversight of the NRC through the NRC Manual Chapter 0350 Process, "Staff Guidelines for Restart Approval." Consequently, these issues are being dispositioned as NCVs.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

Sincerely,

/s/ J. A. Grobe
 John A. Grobe, Director
 Division of Reactor Safety

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

Enclosure: Inspection Report 50-315/99004(DRP);
 50-316/99004(DRP)

cc w/encl: A. C. Bakken III, Site Vice President
 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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*See previous concurrences

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These Severity Level IV violations are being treated as Non-Cited Violations (NCVs). Appendix C of the Enforcement Policy requires that for Severity Level IV violations to be dispositioned as NCVs, they be appropriately placed in the licensee's corrective action program. Implicit in that requirement is that the corrective action program be fully acceptable. The D. C. Cook Plant corrective action program was not adequate and has been the focus of significant attention by your staff to improve the program. While your staff and the NRC have not yet concluded that the corrective action program is fully effective, the corrective action program improvement efforts are underway and captured in the D. C. Cook Restart Plan which is under the formal oversight of the NRC through the NRC Manual Chapter 0350 Process, "Staff Guidelines for Restart Approval." Consequently, these issues will be dispositioned as NCVs.

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D. Cooper, Plant Manager
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
Emergency Management Division
MI Department of State Police
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