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50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316
AUTH.NAME AUTHOR AFFILIATION
GROBE,J.A. Region 3 (Post 820201)
RECIP.NAME RECIPIENT AFFILIATION
POWERS,R.P. American Electric Power Service Corp.

SUBJECT: Forwards insp repts 50-315/99-07 & 50-316/99-07 on 990712-30 & 0816.Seven violations of NRC requirements occurred & being treated as NCVs,consistent with App C of enforcement policy.

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CATEGORY 2 DOCUMENT

September 16, 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 50-315/99007(DRS); 50-316/99007(DRS)

Dear Mr. Powers:

On August 16, 1999, the NRC completed a special inspection at your Donald C. Cook Units 1 and 2 reactor facilities. The purpose of the inspection was to examine the activities related to the discovery phase of the Expanded System Readiness Review (ESRR) program. Our inspection generally focused on two risk-significant systems to evaluate the ESRR program's effectiveness at verifying that the plant was modified, tested, operated and maintained consistent with the design and licensing bases. The enclosed report documents the results of the inspection.

Based on our inspection, we concluded that, overall, your staff effectively implemented the discovery phase of the ESRR process. For the systems we evaluated, the scope of the reviews was broad and conceptually consistent with the purpose of confirming the performance of system safety functions. Further, the breadth and depth of material reviewed during the ESRRs were considered appropriate. The overall effectiveness of the ESRR teams was demonstrated by their identification of substantive issues which could potentially impact system safety functions.

There were several instances where the NRC team identified deficiencies that were not specifically identified during the ESRRs. In most cases, the ESRRs or programmatic area reviews had already revealed more general or broader deficiencies, and there was reasonable assurance that the specific deficiency would be captured by subsequent corrective actions. In a few limited cases, we determined that the ESRRs should have identified our specific finding and other processes would probably not have revealed the issue. Because the number of later cases were limited and they did not directly impact a system safety function, these represented isolated implementation weaknesses and not broad deficiencies in the ESRR process.

While the ESRRs have been completed for the risk significant systems, several broad deficiencies were identified through the system reviews and programmatic readiness reviews that could affect many systems. The extent of the impact of those deficiencies is still being evaluated through the corrective action process. The effectiveness of the corrective action program will be essential to ensure that problems continue to be identified and are effectively resolved.

During the inspection, the NRC also identified an example where your staff did not exercise appropriate sensitivity to the potential impact on operability of fuse control deficiencies identified during the ESRR of the 250 Volt direct current system. This was of particular concern since a problem regarding the sensitivity to equipment required for Modes 5 and 6 was identified by the NRC following two electrical faults which occurred on April 19, and April 24, 1999. Two examples of operability evaluations which failed to adequately address structural deficiencies were also identified. Collectively, these examples indicated that continued management attention is warranted in the operability evaluation area.

Based on the results of this inspection, the NRC has determined that seven violations of NRC requirements occurred. These violations are being treated as Non-Cited Violations (NCVs), consistent with Appendix C of the Enforcement Policy. These NCVs are described in the subject inspection report. If you contest the violation or severity level of these NCVs, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001, with a copy to the Regional Administrator, Region III, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-0001. Appendix C of the Enforcement Policy requires that for Severity Level IV violations to be dispositioned as NCVs, they be appropriately placed in a licensee corrective action program. Implicit in that requirement is that the corrective action program be fully acceptable. However, the D.C. Cook corrective action program has been identified as inadequate and has been the focus of significant attention by your staff for improvement. While your staff and the NRC have not yet concluded that the corrective action program is fully effective, the corrective action program improvement efforts underway are captured in the D.C. Cook Restart Plan which is under the formal oversight of the NRC through the NRC Manual Chapter 0350, "Staff Guidelines for Restart Approval," process. Consequently, these issues will be dispositioned as NCVs.

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 provide one, will be placed in the NRC Public Document Room.

Sincerely,

Original /s/ John 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 50-315/99007(DRS);
50-316/99007(DRS)

See Attached Distribution

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Sincerely,

John A. Grobe, Director
Division of Reactor Safety

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

Enclosure: Inspection Report 50-315/99007(DRS);
50-316/99007(DRS)

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