

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-315/91007(DRSS); 50-316/91007(DRSS)

Docket Nos. 50-315; 50-316

License Nos. DPR-58; DPR-74

Licensee: Indiana Michigan Power Company
1 Riverside Plaza
Columbus, OH 43216

Facility Name: D. C. Cook Nuclear Plant, Units 1 and 2

Inspection At: D. C. Cook Site, Bridgman, Michigan

Inspection Conducted: March 18-22, 1991

Inspectors: *H.G. Simons*
H. G. Simons

3/27/91
Date

D.M. Barss
D. M. Barss

3/27/91
Date

Approved By: *William Snell*
William Snell, Chief
Radiological Controls and
Emergency Preparedness Section

3/27/91
Date

Inspection Summary

Inspection on March 18-22, 1991 (Report Nos. 50-315/91007(DRSS);
50-316/91007(DRSS))

Areas Inspected: Routine, announced inspection of the following areas of the D. C. Cook Nuclear Plant's emergency preparedness program: follow-up of licensee actions on previously identified items (IP 92701); follow up on actual emergency plan activations (IP 92700); and operational status of the emergency preparedness program (IP 82701). This inspection involved two NRC inspectors.

Results: No violations, deficiencies or deviations were identified during the inspection. One suggestion for improvement was recommended regarding the development of a training matrix for Emergency Response positions. The licensee gives excellent management support to the well maintained Emergency Preparedness program which they continue to improve through self evaluation.

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DETAILS

1. Persons Contacted

A. A. Blind, Plant Manager
E. E. Fitzpatrick, Executive Assistant
J. E. Rutkowski, Assistant Plant Manager Technical Support
K. R. Baker, Assistant Plant Manager Production
L. S. Gibson, Assistant Plant Manager Projects
R. S. Krieger, Emergency Preparedness Coordinator
J. Lewis, Corporate Emergency Preparedness Coordinator
V. Kincheloe, Training Supervisor
D. R. Leibel, Training Instructor
J. Wojcik, Technical Physical Sciences Supervisor
J. L. St. Amant, Technical Engineering Supervisor
G. Griffin, Stores
R. Allen, Maintenance Reg Supervisor
R. Heydenberg, Computer Science
I. D. Fleetwood, Operations
G. T. Peterson, Project Engineering
L. Matthias, Administrative Support
S. Wolf, Site QA Senior Auditor

All of the above listed individuals attended the NRC exit interview held on March 22, 1991.

The inspectors also contacted other licensee personnel during the course of the inspection.

2. Licensee Action on Previously Identified Items (IP 92701)

(Closed) Open Item No. 315/90003-01: Review Procedure 01-OHP 4023.002.003, "Steam Generator Tube Leak", to determine if appropriate warnings exist regarding emergency boration of the reactor coolant system at power.

This procedure has been reviewed and appropriately revised to include an additional check step to ensure the unit is shut down prior to emergency boration. This item is closed.

(Closed) Open Item No. 315/90003-02: Personnel arriving at the Emergency Operations Facility (EOF) were not monitored for potential contamination.

A frisker has been established at the entrance to the EOF to be used by arriving personnel to monitor for potential contamination. The inspectors observed a training drill at the EOF and verified that the arriving personnel performed an appropriate hand and foot frisk. This item is closed.

(Open) Open Item No. 315/90003-03: Nuclear Plant Notification forms contained incorrect information as to the description of the events or initiating conditions during the 1990 exercise.



The inspectors observed a training drill at the EOF and reviewed a number of the Nuclear Plant Notification forms that were generated. Some of these forms were filled out inconsistently with each other and some were incomplete. This item will remain open and be evaluated at the licensee's next annual emergency preparedness exercise.

(Closed) Open Item No. 315/90016-01: Annual Emergency Plan (EP) retraining criteria are not clearly defined and an ambiguity exists concerning the definition of annual between EP training and licensed operator requalification program.

The Training Program Management Plan (TAM), Section 5.06, has been appropriately revised to define and clarify the EP retraining requirements and the term annually. This item is closed.

(Closed) Open Item No. 315/90016-02: Four individuals were identified with inconsistent EP retraining.

After revising Section 5.06 of the TAM, the licensee did a complete review of all EP training records to ensure all emergency response personnel had received retraining in accordance with the new criteria set forth in TAM, Section 5.06. Through this review, they discovered two persons which were not properly trained and they promptly retrained these individuals. This item is closed.

3. Emergency Plan Activations (IP 92700)

Since August 10, 1990, the licensee has had two actual activations of the Emergency Plan.

At 0507 hrs on November 16, 1990, the licensee declared an Unusual Event (UE) per Emergency Condition Categories (ECC) 10, "Loss of AC Power". This was a planned evolution for maintenance purposes which resulted in both Diesel Generators (DG) being unavailable.

At 1325 hrs on November 28, 1990, the licensee declared an UE per ECC 10. This event resulted from a preplanned outage of the west essential service water system. This removed cooling water to the AB DG rendering it inoperable. The CD DG was inoperable and out of service for maintenance. Thus both DGs for Unit 1 were unavailable or inoperable.

The licensee's records for each of the above emergency plan activations were reviewed. For each event an appropriate classification was made and notifications to State and local officials and the NRC were accomplished within required time limits. The licensee maintains a file for each activation which include copies of such items as condition reports, problem reports, event notification worksheets, initial off-site notification lists, and other applicable logs needed to fully understand the event.

No violations or deviations were identified in the review of this program area.



4. Operational Status of the Emergency Preparedness Program (IP 82701)

a. Emergency Plan and Implementing Procedures

Revision 9 of the licensee's Emergency Plan was issued on November 30, 1990. Copies of this revision were distributed to appropriate personnel and organizations, including the NRC, within 30 days of the change.

By letter dated February 1, 1991, NRC Region III staff documented their review and approval of Revision 9 to the Emergency Plan for the D. C. Cook Nuclear Plant, which had an effective date of November 30, 1990. A review of the several minor revisions made to the emergency preparedness program indicated that major changes had not been made, and these changes had not adversely affected the overall state of emergency preparedness. Licensee personnel were aware that changes to the Emergency Plan determined to decrease the effectiveness of the plan could not be implemented without prior NRC approval.

Minor revisions to several of the licensee's implementing procedures have been made since the last inspection and reviewed by the NRC. The licensee has taken care to ensure that these changes have been reflected, as appropriate, in other station procedures. The inspector noted that for each revision an appropriate signed cover page was available, indicating each procedure had been properly reviewed and approved in accordance with established procedural guidance. Copies of each revision were submitted to the NRC within 30 days of implementation.

The licensee has developed an Emergency Plan Administrative Manual (EPAM) which contains guidelines for the maintenance of emergency response capabilities. This manual replaces several Emergency Plan Procedures (EPP) which had previously defined program maintenance activities. These procedures were of an administrative nature and are more appropriately addressed in the newly developed EPAM.

The licensee's parent company, American Electric Power Service Corporation, revised their Emergency Response Manual since the previous routine inspection. These revisions were reviewed during the course of this inspection and found to generally be of a minor nature, mostly administrative name changes to current titles on organization charts. One new position was added to the Initial Assessment Group (IAG) and one position was moved from the onsite Emergency Response Organization to the IAG. These changes are consistent with the requirements of 10 CFR 50.54(q) and do not decrease the effectiveness of the licensee's emergency response plan. These changes are acceptable.

Current copies of the Emergency Plan and appropriate implementing procedures were readily available in each emergency response facility and Control Rooms.

No violations or deviations were identified in the review of this program area.

b. Emergency Facilities, Equipment, Instrumentation and Supplies

An inspection tour was conducted through the Technical Support Center (TSC), Operational Staging Area (OSA), Emergency Operations Facility (EOF), Control Room (CR), and the offsite monitoring vehicle. These facilities were found to be generally as described in the Emergency Plan and associated procedures. All facilities appeared to be in an acceptable state of operational readiness.

Emergency Notification System Telephones (NRC "Red Phones") were successfully tested with the exception of in the Unit 2 CR where there was low volume on the receiver end and in the EOF where an annoying echo was present on the receiver end. Both of these problems were reported for repairs.

In each CR an attache case is kept for emergency use which is stocked with appropriate procedural attachments which are to be used as "worksheets", Nuclear Plant Accident Forms, and other appropriate materials to be used in the event of an emergency. An out of date phone list was found in the Unit 1 CR attache case. However, it was noted that a current phone list was available in the CR. The licensee removed the old phone list and reviewed the entire case to ensure it contained current revisions of the procedural attachments. No other discrepancies were found.

While touring the TSC, it was learned through discussion with the EP coordinators that the six portable emergency lights were not on a surveillance schedule for periodic testing. All emergency lights were found to be operational. The licensee has added these emergency lights to Planned Maintenance (PM) Task 9. In addition, job order No. A31363 was issued during the course of the inspection to perform the routine PM inspection.

During the tour of the OSA, the inspectors noted the new mobile radios which will enhance communications between the fields teams and the environmental director. The three phone dedicated cascading telephone system for call back from teams in the plant was also noted as a useful system.

Emergency communication systems surveillance records for the emergency response facilities were reviewed and found to be complete and thorough. These surveillances are conducted monthly and include the NRC Emergency Notification System (ENS) and Health Physics Network (HPN) phones. The licensee's inventory records for emergency supplies were reviewed and found to have been completed as detailed in the appropriate procedures.

No violations or deviations were identified in the review of this program area.

c. Organization and Management Control

Overall organization and management control of the Emergency Preparedness (EP) program was unchanged from the last routine inspection.

As of November 1990, there is a new corporate emergency planning coordinator (EPC). The previous EPC is now a station technical advisor. The new EPC is a degreed health physicist and has had some experience in emergency planning. She has been with American Electric Power Service Corporation (AEPSC) for almost three years and appears qualified and well trained for her new position.

A new Vice President Nuclear Operations of AEPSC has been appointed and will assume responsibilities as of April 1, 1991. He attended the training drill at the EOF for familiarization purposes and gave some suggestions for improvement. This exemplifies the strong management support which EP receives.

One Technician is made available to the site EPC to assist with emergency response facility equipment and supply maintenance activities. The amount of time given to EP by this technician has decreased to about 20%. However, under the licensee's manning plan, they plan to hire an entry level person to assist the site EPC.

Adequate numbers of personnel have been identified for specific lead and support positions in the onsite ERO. The licensee maintains at least three qualified individuals to fill ERO positions.

One change has been made to the corporate ERO. The civil engineering coordinator was deleted from the ERO and added to the Initial Assessment Group (IAG).

The notification phone list for the onsite ERO has been updated on a quarterly basis. The licensee verifies response time capabilities as part of their semi-annual augmentation drills.

No violations or deviations were identified in the review of this program area.

d. Emergency Preparedness Training

The inspectors observed a training drill held at the EOF. This was a very effective method of training with the more experienced personnel guiding the less experienced through an emergency response scenario. The drill was followed by a meaningful critique. The licensee has a goal of conducting monthly training drills.

The Emergency Plan requires the following functional drills: an annual graded exercise, annual medical emergency drill, an



annual radiological monitoring drill, an annual health physics drill involving the post accident sampling system, a semi-annual health physics drill involving response to and analysis of simulated airborne and liquid samples and direct radiation measurements in the environment. Licensee records documented the completion of all drills as specified in the Emergency Plan.

A critique using newly developed formalized critique checklists is conducted for each drill to evaluate the program, procedures and player performance. Improvement items are tracked utilizing the Emergency Preparedness Administrative Tracking System (EPATS).

Information obtained by a review of training records indicated that 15 randomly selected personnel assigned to the ERO had all been trained in accordance with the established training requirements. These training requirements clearly state who is to receive training; however, they do not describe the type of training the different ERO positions will receive. No upper tier document defines or describes the content or information to be taught as would be found in a training matrix. For managerial positions in the ERO, training includes completing a qualification card which is basically a practical factors demonstration. These qualification cards outline the training which is needed to successfully complete these cards. The skills type responders do not have qualification cards. Consideration should be given to developing a training matrix that would clearly define the topics that all ERO positions, both managerial and skills personnel, should be trained in.

The inspectors also viewed a videotape which was used for retraining in 1990. This was also a very effective method of training. The video was interesting, informative, and very well done.

No violations or deviations were identified in the review of this program area.

e. Independent Reviews/Audits

The Nuclear Safety and Design Review Committee (NSDRC) audit for 1990 (Audit No. 167) was conducted February 26, 1990 to March 2, 1990 and documented by audit report dated April 4, 1990.

The NSDRC audit for 1991 (Audit No. 179) was conducted February 25, 1991 to March 1, 1991. The final audit report has not yet been issued and therefore was unavailable for review.

Both audits were conducted by using an approved audit plan which took into consideration audit recommendations from previous audits, NRC open items, and selected criteria established in NUREG-0654.

The 1990 audit did not result in any problem reports. It did however provide seven recommendations for improvement. Followup



was done on previous recommendations from the 1989 audit and four recommendations were closed. This audit fulfilled the requirements of 10 CFR 50.54(t) and included an evaluation of the adequacies of the interface between State and local governments. The audit was made available to the State and local governments and distributed to appropriate management personnel.

Corporate quarterly reviews of the EP program continue to be conducted. Monthly drills are critiqued by both an immediate critique with players to discuss observations and a formal drill report to record closure of objectives and establish critique action items. Action items are assigned to drill committee members or other personnel as appropriate and tracked using the Emergency Preparedness Action Tracking System (EPATS).

No violations or deviations were identified in the review of this program area.

5. Exit Interview

The inspectors met with licensee representatives denoted in Section 1, on March 22, 1991. The inspectors reviewed the scope and findings of the inspection and indicated that the licensee continues to have a well maintained emergency preparedness program.

The licensee indicated that the information discussed was not of a proprietary nature.

