U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-315/94019(DRSS); 50-316/94019(DRSS)

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

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

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

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

Inspection Conducted: October 3-7, 1994

Inspector: J. E. Foster 10/11/94
J. Foster Date

Approved By: J. W. McCormick-Barger 10/14/94
J. W. McCormick-Barger, Chief Date
Radiological Programs Section

Inspection Summary

Inspection on October 3-7, 1994 (Reports No. 50-315/94019(DRSS); 50-316/94019 (DRSS))
Areas Inspected: Routine, announced inspection of the operational status of the D. C. Cook Plant's emergency preparedness (EP) program (IP 82701), observation of the annual exercise and follow-up on licensee actions on previously identified items (IP 82301/82701).
Results: No violations or deviations were identified. The overall status of the emergency preparedness program was excellent. Response facilities were in a state of operational readiness. Audits and surveillances of the program satisfied the requirements of 10 CFR 50.54(t). The emergency planning organization was adequately staffed.

DETAILS

1. Persons Contacted

E. Fitzpatrick, Vice President, Nuclear Operations
*A. Blind, Plant Manager
J. Rutkowski, Assistant Plant Manager-Technical Support
*L. Gibson, APM Manager
*J. St. Amand, PLE Supervisor
*J. Wiebe, Quality Assurance & Control Superintendent
*T. Bielman, Maintenance Superintendent
*R. Krieger, Emergency Preparedness (EP) Coordinator
*A. Lotfi, Site Design/Department Manager
*J. Smith, Assistant EP Coordinator
S. Colvis, Corporate EP Coordinator
*D. Noble, Radiation Protection Superintendent
*T. Postlewait, Site Engineering Support
R. West, Licensing Coordinator

*D. Hartland, Resident Inspector, NRC
*J. Isom, Senior Resident Inspector, NRC

The above asterisked personnel and other licensee staff attended the exit interview on October 7, 1994, in person or by teleconference. The inspector also contacted other licensee personnel during the inspection.

2. Licensee Action on Previously Identified Items (IP 82301)

(Closed) Inspection Followup Item No. 50-315/93017-01: During the 1993 exercise, it was identified that an informal emergency response organization (ERO) had been established in the Control Room. The licensee had developed Procedure OHI-2080, "Conduct of Operations (Emergency Organization)", effective 1/3/94 describing the Control Room emergency response organization. Determining how well the shift crew complied with this procedure was an objective (which was met) in the 1994 emergency exercise. This item is closed.

(Closed) Inspection Followup Item No. 50-315/93017-02: During the 1993 exercise, it was identified that the licensee needed to reevaluate the practice of having Auxiliary Equipment Operators (AEOs) staged in the Control Room and reporting to the Shift Supervisor. Procedure OHI-2080, "Conduct of Operations (Emergency Organization)", noted above, also provides for a "contingency team" comprised of Reactor Operators and Auxiliary Equipment Operators. Section 3.2.7 of the procedure provides for dispatch of the Contingency Team to the Operations Staging Area under certain conditions, including declaration of a Site Area Emergency. This item is closed.

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

a. Actual Emergency Plan Activations

An Unusual Event was declared on March 29, 1993, at 1104 hours, due to receipt of a control rod urgent failure alarm and the necessity to shutdown per Technical Specification 3.1.3.5.

An Unusual Event was declared on August 12, 1993, at 1745 hours, due to receipt of a telephone bomb threat. A search of the plant did not identify any explosive devices, and the time specified by the caller for bomb explosion passed.

An Unusual Event was declared on August 15, 1994, at 0035 hours, due to loss of both main feedpumps, subsequent loss of steam generator levels, and reactor trip.

Records reviewed indicated that classifications and notifications of event declarations and terminations had been made properly and in a timely manner. Documentation packages for each event were complete, and technically correct.

No violations or deviations were identified.

b. Emergency Plan and Implementing Procedures

The most recent revision to the Emergency Plan (Revision 13, dated June 15, 1994) had been reviewed and approved by Region III. The licensee had submitted a revision to the Emergency Action Level (EAL) scheme devised by the Nuclear Management and Resources Council (NUMARC). This submittal was under review at the time of this inspection.

Few changes have been made to the Emergency Plan Implementing Procedures since the last routine inspection. One change involved revision to PMP 2080 EPP.107, "Notification of Plant Personnel." This revision deleted the attachment containing individuals names/telephone numbers and now refers to "Plant Manager's Standing Order PMSO-150" which contains this information.

Plant Manager's Standing Order PMSO-147 formalized the Emergency Planning Advisory Committee (formerly the Plant Scenario Committee).

No violations or deviations were identified.

c. Emergency Response Facilities, Equipment, Instrumentation and Supplies

Tours were conducted through the Control Room, Technical Support Center (TSC), Operational Support Center (OSC), and Emergency Operations Facility (EOF). Each facility was well maintained and

in an operational state of readiness. It was verified that adequate numbers of current copies of the Emergency Plan and Emergency Plan Implementing Procedures and appropriate forms were present in each emergency response facility.

Discussion with licensee personnel and documents reviewed indicated that emergency equipment inventories and maintenance were generally very good, with timely corrective actions taken where deficiencies were identified.

Procedure 12 THP 6010 RPP.009 (Rev.8),"Emergency Equipment Inventory" provides for monthly inventories of instrumentation and respiratory equipment, semi-annual inventories of potassium iodide tablets and thermoluminescent dosimeters, quarterly inventories of other supplies, and inventories after each exercise. The procedure includes a matrix indicating the location and types of emergency supplies at indicated locations. The body of the procedure provides for specific numbers or minimums for various pieces of equipment. However, discussion indicated that specific numbers of supplies or other equipment were not provided for inventory purposes. Review of the licensee's actions to resolve this concern will be tracked as Inspection Followup Item 50-315/94019-01.

The licensee had added 26 additional electronic, voice-capable sirens to replace 9 air powered sirens. Sound power testing of the sirens had been completed, and the old sirens will be removed when the reliability of the new sirens is verified.

Installation of 19 personal computers for emergency response facilities with access to Plant Process Computer data, plant component database, maintenance action Request database, and E-mail and other Local Area Network (LAN) provided services was nearing completion.

Tours of the TSC and EOF indicated that provisions for seating the NRC incident response site team had been made. However, these provisions did not include seating the site team personnel next to their licensee counterparts. The need for NRC site team collocation with licensee counterparts was discussed with licensee personnel.

No violations or deviations were identified.

d. Organization and Management Control

There have been no changes in the overall organization and management control of Emergency Planning since the last routine inspection.

The Emergency Planning Coordinator (EPC) reports to the Assistant Plant Manager - Support. An assistant EPC had been appointed.

One individual in the corporate headquarters also had emergency planning duties.

No violations or deviations were identified.

e. Training

Records indicated that drills and exercises were formally critiqued, and that significant critique items were selected for corrective action, as appropriate. A review of a current printout of the training tracking system did not identify any individuals as being beyond their qualification date plus grace period, as proceduralized.

Discussion with licensee personnel and a review of records indicated that over twenty various emergency preparedness related drills had been held over the preceding eighteen months. These included single facility, all facilities, medical, Biannual State/County and other drills/exercises.

Training was delineated in Training Program Management Plan (TAM) 5.06 (Rev. 4), which provides the emergency plan training matrix. The licensee's program provided for individuals to have yearly participation in a drill or exercise, or classroom training as provided by the matrix. Due to the comprehensive schedule of drills/exercises, classroom training was largely for new trainees rather than those needing requalification training.

Discussion with licensee personnel indicated that training modules for key incident response personnel did not contain information relative to the NRC Incident Response Program nor the Federal Radiological Monitoring and Assessment Center which would be established by the Department of Energy after a major nuclear accident. Inspection Followup Item 315/94019-02 was opened to track the licensee's actions to address training on NRC and Department of Energy Incident Response programs.

No violations or deviations were identified.

f. Annual Exercise Observation

The Annual Emergency Preparedness Exercise was held on October 4, 1994, and was observed by three inspectors. This was a utility-only exercise with minimal offsite participation. The following are the various facility observations for the exercise:

> Control Room Simulator: The new layout improves emergency functions considerably. The added telephone capability, and the new computer capability were also excellent. There was excellent, fast detection of the accident, a scribe was appointed, noise levels were low, and "repeat backs" from the crew were well done. Procedures were utilized

correctly and staff performed in a professional manner. Classification and notifications were made within goal times. There was an outstanding initial PA announcement, and an excellent decision was made to shutdown at 50% per hour. A reasonable decision was made to sound the nuclear alarm when the public address system was thought totally inoperative. There was a need for more crew briefings.

Simulated TSC: There was an outstanding new projection status board, ERDS was properly activated, classifications were properly done, and outstanding briefings were conducted on a periodic basis.

Operations Staging Area (OSA): Status boards usage was excellent, information was posted for player review, and team briefings observed were good. A portable air sampler was observed in the "recirculation mode", where the exhaust is near the air intake, causing a nonrepresentative sample. This was discussed with Radiation Protection personnel.

Emergency Operations Facility (EOF): There was very good communications with offsite responders. Good command and control, dose projection, and communication with the Joint Public Information Center (JPIC) were also noted. The new reactor parameters projection system and computer capability were excellent. Turnover to Corporate personnel could have been delayed until plant personnel felt more comfortable with the turnover situation (second containment pressure increase was in progress). Briefings were good, but could have more completely addressed current situations and where events appeared to be proceeding.

Recovery Discussion: The discussion addressed immediate and long term concerns in a general fashion. Also addressed were NRC desires regarding equipment failure root cause analysis. There was a need to address Federal Radiological Monitoring and Assessment Center (FRMAC) liaison, etc. Appointment of a Water recovery task force as provided for in the Steam Generator Tube Rupture procedure was excellent.

Critiques were very good.

No violations or deviations were identified.

g. Audits

The inspector reviewed Nuclear Safety and Design Review Committee (NSDRC) Audit No. 208, "Emergency Plan", dated April 19, 1994. The audit resulted in six recommendations and one Point of Information. The audit concluded that the "Cook Plant Emergency Plan is being effectively implemented", and noted many positive program qualities.

The 1994 audit of the EP program satisfied the requirements of 10 CFR 50.54(t) with respect to scope. The EP staff fulfilled the requirement to make relevant audit and surveillance results available to State and county officials by letters dated October 5, 1994.

The overall quality of the 1994 audit was good. Appropriate emphasis was placed on performance based auditor activities, such as observing drills and exercises.

No violations or deviations were identified.

4. Inspection Followup Items

Inspection followup items are matters which have been discussed with Indiana Michigan Power Company management, will be reviewed further by the inspector, and involve some action on the part of the NRC, the utility, or both. Followup items disclosed during the inspection are discussed in paragraphs 3.c and 3.e.

5. Exit Interview

The inspector held an exit interview on October 7, 1994, with those licensee representatives identified in Section 1 to present and discuss the preliminary inspection findings. The licensee indicated that none of the matters discussed were proprietary in nature.