

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Reports No. 50-315/⁸⁰⁻²⁴~~81-02~~; 50-316/⁸⁰⁻²⁰~~81-02~~

Docket Nos. 50-315; 50-316

Licenses No. DPR-58; DPR-74

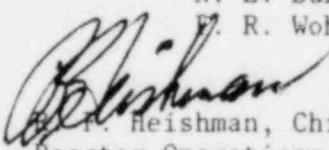
Licensee: American Electric Power Service
Corporation
Indiana and Michigan Power Company
2 Broadway
New York, NY 10004

Facility Name: D. C. Cook Nuclear Power Station

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

Meeting Conducted: December 29, 1980

NRC Personnel Present: J. . Keppier, Director, Region III
R. F. Heishman, Chief, Reactor Operations and
Nuclear Support Branch
D. C. Boyd, Chief, Projects Section 4, Region III
E. R. Swanson, Senior Resident Inspector, D. C. Cook
N. E. DuBry, Resident Inspector, D. C. Cook
F. R. Wohld, Inspector, Region III

Approved By:  R. F. Heishman, Chief
Reactor Operations and
Nuclear Support Branch

2/5/81

Meeting Summary

Management Meeting on December 29, 1980 (Reports No. 50-315/81-02; 50-316/81-02)

Areas Discussed: Management meeting held at the NRC's request to discuss the regulatory performance of the activities at the D. C. Cook Nuclear Power Station as concluded in the Systematic Assessment of Licensee Performance (SALP) Program.

Results: A summation of the licensee performance evaluation was presented. Areas of concern were discussed with corporate management. The performance at the D. C. Cook Nuclear Power Station was considered to be adequate.

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DETAILS

1. Persons Contacted

American Electric Power Corporation

R. S. Hunter, Executive Vice President for Construction
and Nuclear Engineering
R. W. Jurgensen, Assistant Vice President
D. V. Shaller, Plant Manager
B. Z. Svensson, Assistant Plant Manager
J. F. Stietzel, Quality Assurance Supervisor

2. Areas Discussed

- a. A summary of the SALP program was presented including its purpose, basis for and development of the evaluation, and NRC HQ's review of all SALP evaluations.
- b. The NRC SALP evaluation of D. C. Cook Plant's performance was presented.
- c. NRC's analysis of D. C. Cook Licensee Event Report (LER) significance for the SALP period, for 1975-1979, and for the first eight months of 1980 was presented. Comparisons with other Region III operating plants were presented.
- d. NRC's analysis of D. C. Cook noncompliance history for the SALP period (9/1/79-8/31/80), for 1975-1979 and for the first eight months of 1980 was presented. Comparisons with other Region III operating plants were presented.
- e. NRC's new enforcement policy, including its plans for implementation was discussed.

3. Licensee Comments

- a. The licensee expressed great concern regarding the below average rating received in the operations area. They stated that it has always been their intent to excel in this area and that they will take whatever steps that are necessary to achieve this goal. The licensee stated that there has been recent improvement in reducing both the number of human errors committed and the number of occasions where failure to adhere to procedure is involved.
- b. The licensee took exception to a concern raised by the NRC that some of their LER's had been misclassified, possibly to lower the number of human error type events reported. The licensee pointed out that in some cases the cause is not clear and the classification then becomes one of subjective judgement. Following the discussion of several examples it was established that both parties may have valid points and it was agreed that both parties would re-examine their position in this area.

Enclosures: D. C. Cook SALP Report

LICENSEE PERFORMANCE EVALUATION

OPERATIONS

NRC REGION III

Facility: D. C. Cook

Licensee: AEP Corporation/Indiana and Michigan Electric Co. (Subsidiary)

Unit Identification: Docket No. 50-315 License No. DPR-20
Date of Issuance - October 24, 1974 Unit - 1

Docket No. 50-316 License No. DPR-75
Date of Issuance - December 23, 1977 Unit - 2

Reactor Information: NSSS - Westinghouse
MWt - 3250 and 3391
MWe - 1054 and 1100

Appraisal Period: October 1, 1979 - September 30, 1980

Appraisal Completion Date: November 20, 1980

*Review Board Members:

- W. L. Fisher, Chief, Fuel Facility Projects and Radiation Support Section
- C. J. Paperiello, Chief, Environmental and Special Projects Section
- J. F. Donahue, Chief, Security and Investigation Section
- D. H. Danielson, Chief, Engineering Support Section 2
- D. W. Hayes, Chief, Engineering Support Section 1
- D. C. Boyd, Chief, Reactor Projects Section 4
- N. E. DuBry, Resident Inspector, D. C. Cook Plant
- P. R. Wohld, Reactor Inspector, Nuclear Support Section 1
- R. F. Heishman, Chief, Reactor Operations and Nuclear Support Branch
- S. O. Minor, NRR, Licensing Project Manager

*Either attended the review board meeting or provided written or verbal input to the evaluation.

A. Number and Nature of Noncompliance Items

Noncompliance Category:	<u>Unit 1</u>	<u>Unit 2</u>
Violations	0	0
Infractions	16 (one repetitive)	19 (two repetitive)
Deficiencies	7	6

Areas of noncompliance:	Unit 1 (Points)	Unit 2 (Points)
Operations	100	148*
FFMS	12	12
Construction	10	
Safeguards	<u>62*</u>	<u>62*</u>
Total Points	184	222

*(includes one repetitive infraction)

Inspection reports covered by this review (Report Numbers):

Unit 1

50-315/79-23 thru 79-28
50-315/80-01 thru 80-14

Unit 2

50-316/79-20 thru 79-27
50-316/80-01 thru 80-14

Evaluation of noncompliance items:

Operations - During the SALP period 11 inspections were performed in this area; 13 infractions and five deficiencies were identified. These items, though numerically higher than expected were generally not significant from the standpoint of adversely affecting the health and safety of the public. However, the NRC is concerned that approximately 50 percent of these items of noncompliance are related to failure to adhere to procedure. The majority of the cases occurred early in the report period and improvement was noted in the frequency of mistakes. This contributes to the continuing NRC concern regarding the number of personnel errors being made at this plant.

The licensee's performance in this area was rated as below average as compared to the performance of other Region III licensees.

FFMS - During the SALP period four inspections were performed in this area; one infraction and one deficiency were identified. None of these items caused a hazard to the public.

In the areas of radiation protection, radwaste management and radioactive material transportation the licensee's performance was rated as average as compared to the performance of other Region III licensees.

This comparison does reflect the results of the intensive health physics inspection, which was conducted at the D.C. Cook plant December 8-19, 1980.

In the areas of emergency planning and environmental protection the licensee's performance was rated as average. In the area of confirmatory measurements the split sample results were in complete agreement, thus the licensee's performance in this area is rated as "above average" as compared to other Region III Licensees.

The inspection frequency will remain unchanged next year. However, the scope of the emergency planning inspection will be increased due to recent changes in 10 CFR 20 Appendix E.

Safeguards - An investigation was conducted on November 14-16, 1979 based on allegations made by a former guard. None of the allegations were substantiated and no items of noncompliance were identified in the security program or operational activities.

A subsequent security inspection conducted on March 3 - 14, 1980 resulted in three items of noncompliance. (Two infractions and one deficiency.) Two of those items related to Access Control (Identification, Authorization and Badging); the remaining item dealt with Physical Barriers (Vital Area).

An inspection on August 18-22, 1980, disclosed three items of noncompliance (three infractions). The noncompliances dealt with Access Control (Identification, Authorization and Badging), Physical Barriers (Vital Area - Repeat), and Physical Barriers (Protected Area).

The inspection frequency does not need to be changed. Site and corporate management appear to be responsive to security problems and institute adequate corrective action in a timely fashion. The depth of site security supervision is adequate to provide the day-to-day attention expected and required to implement a sound security program. Overall rating compared to other sites is deemed "above average".

Construction - During the SALP period one inspection and two investigations were performed in this area. One item of noncompliance was identified during the inspection and it caused no hazard to the health and safety of the public.

The licensee's professionalism and responsiveness to IE Bulletin No. 79-14 was noted. Based on the inspection in this area, the licensee is rated "above average" overall.

Summary - The number of noncompliances at this site during this review period is approximately 50 percent higher than the regional average. The primary area of concern is failure to adhere to procedures. The second area of concern is human error. While it appears that there has been substantial improvement in the reduction of personnel errors during the SALP period, there have been two recent events which indicate the need for continued improvement in this area.

The licensee's overall regulatory performance is acceptable; however, the site and corporate management need to continue to focus attention in these two areas.

B. Number and Nature of Licensee Event Reports

Type of Events:	<u>Unit 1</u>	<u>Unit 2</u>
Personnel errors (A)	5	8
Defective procedures (D)	2	2
Component failure (E)	21	30
Design (B)	7	6
Other (X)	6	6

Licensee Event Reports Reviewed (Report Nos.)

Unit 1 - 79-52 thru 79-67 and 80-01 thru 80-25

Unit 2 - 79-35 thru 79-54 and 80-01 thru 90-20

Evaluation of LER's:

During this SALP period approximately 14 percent of the LER's were related to personnel errors while the majority of reportable events (57%) were attributed to component failure. The number of reportable events has remained the same, though there has been a significant reduction in the percentage of personnel errors. This was a topic of the management conferences conducted April 15, 1980 and July 3, 1980 as described in paragraph D.

There is concern that certain events may have been misclassified. The reporting and classification of events will be closely screened by the NRC. Another concern is the LER's do not appear to be analyzed adequately to point out trends in repetitive equipment failures and management deficiencies.

Examples of recurring reportable occurrences are: Inoperable fire barriers, Radiation Monitor failures, and Auxiliary Feed Pump failures.

C. Escalated Enforcement Actions

Civil Penalties - None

Orders - None

Immediate Action Letters - None

D. Management Conferences Held During Past Twelve Months

April 15, 1980 - Corporate Quality Assurance Program - Regulatory Performance

July 3, 1980 - Regulatory Performance

E. Justification of Evaluations of Functional Areas Categorized as Requiring an Increase in Inspection Frequency/Scope (See evaluation sheets)

Emergency Planning

Increased inspection scope is warranted in this area because of the recent changes in 10 CFR 50, Appendix E. This is also applicable to other Region III licensees.

Fire Protection

Increased inspection scope is warranted in this area because of the addition of Appendix R to 10 CFR 50, and unresolved items in this area.

Reporting

Increased inspection scope is warranted in this area due to the apparent shift in categorization of reported occurrences discussed in paragraph B.

F. Other Observations

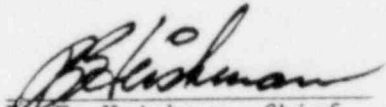
Licensing Activities

In general the licensee has been responsive to the NRC requests, especially to the numerous requests that resulted from the TMI Task Force. Some Technical Specification changes have been delayed but most of these can be attributed to the large burden placed on the licensee by the Short Term Lessons Learned, the TMI Task Action Plan, NRC Orders, and IE Bulletins.

In general, the licensee's performance in this area is rated as "above average", as compared to other licensees within the Licensing Project Managers scope of experience. However, in a few instances there appear to be some communication problems between personnel at the plant and personnel at the New York corporate offices.

D. C. COOK
PERFORMANCE EVALUATION

FUNCTIONAL AREA	Inspection Frequency and/or Scope		
	INCREASE	NO CHANGE	DECREASE
1. Management Control		X	
2. Plant Operations		X	
3. Refueling Operations & Activities		X	
4. Maintenance		X	
5. Surveillance & Preoperational Testing		X	
6. Training		X	
7. Radiation Protection		X	
8. Environmental Protection		X	
9. Emergency Planning	X		
10. Fire Protection	X		
11. Security & Safeguards		X	
12. Design Changes & Modifications		X	
13. Reporting	X		
14. QA Audits		X	
15. Committee Activities		X	
16. Quality Control		X	
17. Procurement		X	


 K. F. Heishman, Chief
 Reactor Operations and
 Nuclear Support Branch

2/5/81
 Date