

INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

May 13, 1982
AEP:NRC:0625B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
IE REPORT NOS. 50-315/82-06; 50-316/82-06

Mr. James G. Keppler, Regional Director
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region III
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

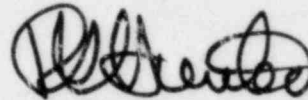
In response to your April 13, 1982 letter, we are providing in the attached Tables 1 through 8 a listing of the actions we have accomplished and those we intend to continue in the future towards meeting the eight objectives, "a" through "h", listed in the report enclosed with your letter. These include a status of each of the action items listed in our January 25, 1982 letter (AEP:NRC:0625A) as well as several other efforts. Each Table describes the actions we have completed, the actions we have underway, and further actions planned to meet the objective. Where possible, a scheduled date for completion is identified. Some of our actions are applicable to more than one objective; these are listed under each applicable objective.

Achievement of these objectives, I am certain, will effectively address the types of events that formed the basis for the Enforcement Conference. Timely accomplishment of the objectives is important to us, and we are working diligently towards this goal. As you can see, we are making a good deal of progress in this regard. I am personally committed to this investigation and appreciate your interest in this matter.

MAY 19 1982

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,



R. S. Hunter
Vice President

RSH/emc
Attachment

cc: John E. Dolan - Columbus
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
Joe Williams, Jr.
Region III Resident Inspector - Bridgman

LICENSEE ACTIONS UNDERWAY (Cont'd.)

6. Expanded the AEPSC Nuclear Safety and Design Review Committee's (NSDRC) Subcommittee on Audits review function to include as part of their Plant audits an attempt to ascertain any present weaknesses in managerial direction and, in particular, to look for trends detrimental to quality. The Subcommittee will concentrate their reviews on the implications of audit findings, searching for clues to problems that might exist but are now uncovered by a single audit which by its nature is limited in scope. Subcommittee audit procedures will ensure the prompt resolution of all findings by the timely reference of problems to successively higher levels of management. The Subcommittee will bring significant findings to the attention of the main NSDRC for review, discussion and any additional necessary action.

FURTHER LICENSEE ACTIONS PLANNED:

1. Review of Technical Department and Maintenance Department Instructions/Procedures. The ALARA program will have a considerable input to this review. (See Table 8, Item 5)

TABLE 1

OBJECTIVE:

- a. Strengthen Site Management and Management Controls.

LICENSEE ACTIONS COMPLETED:

1. New Plant Manager.
2. New Operations Superintendent.
3. Organization realigned to more clearly define reporting of the Cook Plant Manager. (See Note 1)
4. AEP Chairman's Nuclear Operations and Engineering Corporate Policy Statement issued.
5. AEPSC Manager of Nuclear Operations Policy Statement issued.
6. AEPSC Engineering Division Managers implementing Policy Statements issued.
7. Review by Senior Reactor Operators and AEPSC engineers of Operations Department procedures. (See Note 2)
8. Annunciator procedures review.
9. Fire Protection Coordinator added to Plant management staff.

LICENSEE ACTIONS UNDERWAY:

1. Review of position descriptions of AEPSC and Plant personnel who work on Cook Plant activities planned for completion by July, 1982. (See Note 3)
2. Review of Plant Manager's Instructions/Procedures planned to be completed in July, 1982. (See Note 4)
3. Review and approval of Operations Department procedures by QA and PNSRC is 96% as of May 4, 1982 and is planned to be completed by June 1, 1982.
4. The Plant Manager's implementing Policy Statement is under development for completion before the end of May 1982.
5. Continuing reviews by Admiral Williams and W. W. Lowe of the areas outlined in our January 25, 1982 letter (AEP:NRC:0625A).

Continued

TABLE 2

OBJECTIVE:

- b. Improve Followup of Corrective Actions.

LICENSEE ACTIONS COMPLETED:

1. System established to provide early notice on items requiring evaluation in NRC Exit Interview minutes.

LICENSEE ACTIONS UNDERWAY:

1. Plant Quality Assurance Department compilation and verification of commitments made to NRC in Licensee Event Reports and responses to Inspection and Enforcement Reports and NRC Bulletins. Due to be completed by September 1, 1982.
2. Upgrading the Commitment List for more effective use and followup by the Plant and AEPSC supervisory staffs. Targeted completion date is September, 1982.

FURTHER LICENSEE ACTIONS PLANNED:

1. Discussions will continue to be held with the Plant and AEPSC supervisory staff on the necessity of regulatory compliance, and on the need to verify that commitments are completed, and that corrective actions are effective.
2. Tracking of responses to NRC commitments to ensure prompt reply to the extent possible.

TABLE 3

OBJECTIVE:

- c. Improve Surveillance Program Control and Accountability.

LICENSEE ACTIONS COMPLETED: (See Note 5)

1. All Plant Departments have entered their data base into the computer-based technical specification surveillance test scheduling program.
2. Users Manual for program completed.
3. Subroutine to perform scheduling calculations completed and placed in general use.

LICENSEE ACTIONS UNDERWAY:

1. Plant Departments are using both the computer system and the manual method to track surveillance schedules until the computer system is debugged. Target date for discontinuing the use of the manual method is September 1, 1982.

TABLE 4

OBJECTIVE:

- d. Improve Attitude in Complying with Regulations.

LICENSEE ACTIONS COMPLETED:

1. A statement to achieve this objective included in AEPSC management's "Nuclear Operations and Engineering Policy".
2. System established to expedite review of, and action on, NRC Exit Interview minutes .
3. Presentation made by G. Charnoff, Esquire, of Shaw, Pittman to Managers of the Plant and Departments and Supervisory Staffs.

LICENSEE ACTIONS UNDERWAY:

1. Plant Quality Assurance Department compilation and verification of commitments made to NRC in Licensee Event Reports, and responses to Inspection and Enforcement Reports and NRC Bulletins. Due to be completed by July 1, 1982.
2. Upgrading the Commitment List for more effective use and followup by the Plant and AEPSC engineering staffs. Targeted completion date is September, 1982.
3. Plant Manager's implementing Policy Statement, to be issued by the end of May, 1982 will include a statement to achieve this objective.

FURTHER LICENSEE ACTIONS PLANNED:

1. Discussions will continue to be held with Plant and AEPSC supervisory staff on the necessity of regulatory compliance, and on the need to verify that commitments are completed, and that corrective actions are effective.
2. Tracking of responses to NRC commitments to ensure prompt reply to the extent possible.
3. Presentation by G. Charnoff, Esquire, of Shaw, Pittman on complying with Regulations will also be made to the AEPSC engineering management and staff.

TABLE 5

OBJECTIVE:

- e. Identify Root Cause of Personnel Errors and Preclude Repetition.

LICENSEE ACTIONS COMPLETED:

1. For personnel errors, we have a formalized process of investigation which must be completed whenever a personnel error is made. The objective of this process is to assist in identifying and correcting underlying causes.
2. 5-shift operation initiated which has provided a regular training period as well as reduced overtime.
3. Final color scheme for Unit designation labels selected. (Black letters on an orange background for Unit 1. White letters on a blue background for Unit 2.)
4. Independent verification process, applicable to Clearance Permits, in trial use in the Operations Department.
5. Review by Senior Reactor Operators and AEPSC engineers of Operations Department procedures. (See Note 2)
6. Annunciator procedures review.
7. All Plant Departments entered their data base into the computer-based technical specification surveillance test scheduling program.

LICENSEE ACTIONS UNDERWAY:

1. Preparing to purchase and then install Unit designation labels. A trial labeling program for breakers planned to be completed by July 1, 1982 at which time the final method of labeling will be selected.
2. Plant Departments are using both the computer system and the manual method to track surveillance schedules until the computer system is debugged. Target date for discontinuing the use of the manual method is September 1, 1982.
3. Developing independent verification system for consistent Plant-wide application. Target date for initiating this system is immediately following the Unit 1 refueling outage which is approximately September, 1982.
4. Training of Operations personnel to achieve a sixth shift. The sixth shift is scheduled to be in operation during the second quarter of 1983.

TABLE 6

OBJECTIVE:

- f. Improve Communication and Teamwork between New York and Site, between New York Divisions and between Site Sections.

LICENSEE ACTIONS COMPLETED:

1. Held the first of six scheduled meetings at the Plant in which AEPSC Division Managers made presentations to the Plant management and Supervisory staff -- the first by our Vice President of Mechanical Engineering; the second by our Vice President of Electrical Engineering. (See Note 6)
2. Held monthly management meetings on-site between Plant/Assistant Plant Managers and AEPSC Executive Vice President-Construction and New York Engineering and/or AEPSC Nuclear Engineering Division management.
3. Issued guidelines for telephone communications between AEPSC engineers and the Plant staff. (See Note 7)
4. AEPSC management's "Nuclear Operations and Engineering Policy" identifies the Assistant Vice President of Nuclear Engineering as the liaison between the Plant and AEPSC Engineering Divisions on operational problems.
5. Cooperation between Site Sections has been improved through the adoption of an "everybody is important, everybody must win or we all lose" philosophy. The need for improved communications was also discussed at length by the Plant Manager with the Staff at the January 18, 1982 Staff Conference.

FURTHER LICENSEE ACTIONS PLANNED:

1. Continue AEPSC Division Managers' presentations on-site in accordance with established schedule:

Quality Assurance Division Manager	August, 1982
Nuclear Engineering Division Manager	September, 1982
Design/Civil/Materials Handling Division Manager	December, 1982
Construction Division Manager	February, 1983
2. Continue AEPSC management meetings with the Plant/Assistant Plant Managers at approximately two-month intervals.
3. Implemented the inclusion of extended assignments at the Plant for AEPSC engineers, particularly new hires.

TABLE 7

OBJECTIVE:

- g. Improve Verification System

LICENSEE ACTIONS COMPLETED:

1. Independent verification process as applicable to Clearance Permits, in trial use in the Operations Department.

LICENSEE ACTIONS UNDERWAY:

1. Developing independent verification system for consistent Plant-wide application . Target date for initiating this system is immediately following the Unit 1 refueling outage which is approximately September, 1982 .

TABLE 8

OBJECTIVE:

- h. Determine Adequacy of Administrative Controls.

LICENSEE ACTIONS COMPLETED:

1. New Plant Manager.
2. Independent verification process, applicable to Clearance Permits, in trial use in the Operations Department.

LICENSEE ACTIONS UNDERWAY:

1. Review of position descriptions for Plant personnel. The review is planned for completion in July, 1982. (See Note 3)
2. Review of Plant Manager's Instructions/Procedures planned to be completed in July, 1982. (See Note 4)
3. Preparing to purchase and then install Unit designation labels. A trial labeling program for breakers planned to be completed by July 1, 1982 at which time the final method of labeling will be selected.
4. Developing independent verification system for consistent Plant-wide application. Target date for initiating this system is immediately following the Unit 1 refueling outage which is approximately September, 1982.
5. Evaluating proposals to include a formal ALARA program into Cook Plant's radiation protection program. Targeting selection of ALARA contractor for June, 1982.

FURTHER LICENSEE ACTIONS PLANNED:

1. Review of Technical Department and Maintenance Department Instruction/Procedures. The ALARA program will have a considerable input to this review.
2. Revise Plant Manager's Instructions to properly account for and secure items going into the containment when the reactor vessel head is off the reactor vessel. To be completed prior to the next refueling outage.

NOTES FOR TABLES

NOTE 1:

The Plant Manager now reports directly to the Executive Vice President-Construction and New York Engineering. He continues to report to Indiana & Michigan Electric Company for stores and accounting services. The Plant's Administrative Supervisor reports directly to AEPSC Corporate Personnel Department in Columbus for personnel matters.

NOTE 2:

Management controls should strengthen with improved operating procedures. The Operations Department procedures which were being reviewed by our special task force, and the annunciator procedures, have been reviewed, revised and issued.

NOTE 3:

The position descriptions for Plant personnel, and AEPSC personnel who work on Cook Plant activities, will be reviewed to see that they reflect the appropriate implementing policy statements. The position descriptions for Plant personnel are currently in review and the target date of July, 1982 for completion is still applicable. AEPSC position descriptions exist. We do not expect that major changes will be necessary to the AEPSC position descriptions. The completion of the review of AEPSC position descriptions is now targeted for July, 1982. The slippage for review of AEPSC position descriptions from the April 1, 1982 date stated in our January 25, 1982 letter is needed to give the AEPSC Division Managers approximately two months from the issuance of the implementing policy statements.

NOTE 4:

The Plant Manager Instructions/Procedures are the highest level management instructions at the Plant from which all Department Instructions/Procedures evolve. Therefore, this review should significantly strengthen management controls.

NOTE 5:

As of May 1, 1982, the Operations Department has entered their data base into the computer-based technical specification surveillance test scheduling program. The Users Manual is complete and exists in draft form. The subroutine to perform scheduling calculations has been tested and performs necessary checks on input data. The scheduling subroutine uses data on testing intervals and previous test dates to calculate three future dates: the Plant test date, the nominal requirements date, and the day before the requirement is violated. The tested program library has been placed into general use.

We will continue to use both the computer system and the manual method to track surveillance schedules until we have confidence that the computer can be used alone.

NOTE 6:

These meetings were well received as a forum to exchange information on projects and topics of importance between the Plant staff and the New York Engineering office.

We have a schedule for the remainder of 1982 to continue these management meetings with the other Division Managers which are directed to overcome a "we - they" attitude.

NOTE 7:

These guidelines are working effectively to avoid uncoordinated requests for information and to more quickly respond to the Plant staff's request for assistance or information.

Enclosure

NRC REGION III COMMENTS CONCERNING
AEP LETTER DATED MAY 13, 1982

1. The matter of the reviews by Admiral Williams and W. W. Love were not provided and are still unknown to us.
2. We still have difficulty understanding how some of the actions will accomplish the objective, what priorities have been established, and what steps have been taken or planned to measure the results and effectiveness of the corrective action program. For example:

- a. In regard to strengthening site management and management controls you are reviewing, evaluating and revising lower tier procedures, and at the same time, management policies and instructions which form the foundation for these lower tier documents are also being changed.

We have not had any information as to how the lower tier documents will be consistent with upper tier documents since there has not been a visible integration of this interface.

- b. Your actions listed in Table 2 to improve followup of corrective actions appear only to address improvements in following up commitments to the NRC or NRC identified problems; yet better followup of problems identified by your own organization are obviously also needed. Your QA Department for example, identified twice, the underlying problems concerning plant surveillances before the NRC issued an item of noncompliance for shortcomings in this area.
- c. Statement 1 under Licensee Action Completed in Table 5 implies that a formalized process for investigating and correcting underlying cause did not previously exist. Is this implication correct, or have you implemented something in addition to what previously existed to improve performance in this area?