

SALP RIII

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

American Electric Power Service Corporation
Indiana and Michigan Power Company

DONALD C. COOL NUCLEAR POWER PLANT
Docket No. 50-315; 50-316
Reports No. 50-315/82-16; 50-316/82-16

Assessment Period
October 1, 1980 to April 1, 1982

June 1982

8210060254 821004
PDR ADOCK 05000315
Q PDR

ERRATA SHEET

Facility: D. C. Cook
 SALP Report No.: 50-315/82-15; 50-316/82-16

| Page | Line | Now Reads | Should Read |
|------|----------|--|---|
| 4 | 6 | a total of <u>eleven</u> | a total of <u>ten</u> |
| 4 | 19 | safety <u>inspection</u> | safety <u>injection</u> |
| 4 | 22 | Failure to make Technical Specification Type B and C leak rate reports. | Failure to report excessive Type B and C leak rates. |
| 4 | 28 | (8) Severity Level VI - Failure to properly document requalification training program lesson plans (50-325/82-17(20)). | Delete - |
| 4 | 32 | written reports | written report |
| 5 | 14 | <u>sixty</u> percent of these occurred in | <u>sixty-six</u> percent of the occurred in |
| 5 | 15 | <u>thirty</u> percent | <u>thirty-three</u> percent |
| 5 | 22 | <u>cognitive</u> decision | decision |
| 6 | 29 | eight more operators <u>will be</u> | eight more operators <u>were</u> |
| 8 | 37 | inspections against | inspections <u>by the resident inspectors</u> against |
| 11 | 12 | The <u>categorization</u> | The <u>computerization</u> |
| 12 | 30 | inspection included <u>eight</u> | inspection included <u>nine</u> |
| 13 | after 18 | | Insert - (9) Severity Level III - Failure to demonstrate operability of fire doors and damper and inoperable fire doors in safety related area. |
| 24 | 10 | 1 3(2) (<u>1</u>) | 1 3(2) |
| 24 | 15 | (<u>1</u>) 1(3) | (2) 1(3) |
| 24 | 23 | 0 0 (<u>4</u>) 5(8) 5(<u>11</u>) 2(<u>7</u>) | 0 0 (5) 5(8) 5(16) 2(6) |
| 26 | 9 | 1 1 1(2) 1(<u>1</u>) | 1 1 1(2) 1 |
| 26 | 14 | (<u>1</u>) (3) | (2) (3) |
| 26 | 22 | 0 0 2(<u>4</u>) 3(8) 1(16) 1(<u>7</u>) | 0 0 2(5) 3(8) 1(16) 1(6) |

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Docket No. 50-315
Docket No. 50-316

American Electric Power Service
Corporation
Indiana and Michigan Electric Company
ATTN: Mr. John E. Dolan
Vice Chairman
Engineering
2 Broadway
New York, NY 10004

Gentlemen:

This is to confirm the conversation between Mr. Milioti and Mr. Hayes of the Region III staff scheduling July 7, 1982 at 1:00 p.m. as the date and time to discuss the Systematic Assessment of Licensee Performance (SALP) for the Donald C. Cook Nuclear Power Plant, Units 1 and 2. This meeting is to be held at the Region III office in Glen Ellyn, Illinois.

Mr. James G. Keppler, the Regional Administrator, and members of the NRC staff will present the observations and findings of the SALP Board. Since this meeting is intended to be a forum for the mutual understanding of the issues and findings, you are encouraged to have appropriate representation at the meeting. As a minimum we would suggest you or Mr. R. S. Hunter, Mr. W. G. Smith, and managers for the various functional areas where problems have been identified attend the meeting.

The enclosed SALP Report which documents the findings of the SALP Board is for your review prior to the meeting. Subsequent to the meeting the SALP Report will be issued by the Regional Administrator.

Enclosure 1 to this letter summarizes the more significant findings identified in the SALP Board's evaluation of the Donald C. Cook Nuclear Power Plant for the period of October 1, 1980 to April 1, 1982.

American Electric Power Service 2
Corporation

If you desire to make comments concerning our evaluation of your facility, they should be submitted to this office within twenty days after the meeting date; otherwise, it will be assumed that you have no comments.

In accordance with Section 2.790 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the SALP Report, and your comments, if any, will be placed in the NRC's Public Document Room when the SALP Report is issued.

The comments requested by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-5111.

If you have any questions concerning the SALP Report for the Donald C. Cook Nuclear Power Plant we will be happy to discuss them with you.

Sincerely,

J. A. Hind, Director
Division of Emergency Preparedness
and Operational Support

Enclosures:

1. Significant Findings
2. D. C. Cook SALP Report
(5 copies)

cc w/encls:

Resident Inspector, RIII

Enclosure 1

Significant SALP Report findings for the Donald C. Cook Nuclear Power Plant.

General Observations

During the October 1, 1980 to April 1, 1982, evaluation period some improvements have been noted in some functional areas, mainly in the last part of the evaluation period. However, the number of significant events, noncompliances, and personnel error caused events have increased over the previous evaluation period. Noncompliances have increased 40 percent. Personnel error events have increased 74 percent and have continued to increase throughout the period. Sixty-two percent of the events occurred in the last half of the period and 29 percent in the last quarter. Over all areas, the frequency of noncompliance has decreased in the last part of the period. Fourteen percent of all noncompliances occurred in the last third and ten percent in the last quarter.

Management control and involvement in plant activities has been undergoing a gradual change since the August 4, 1981, enforcement conference after which a 12-step corrective action program was initiated. However, the rate of improvement at this time is still unsatisfactory.

In the following functional areas weaknesses in programs or implementation of programs were evident and additional attention is required in these areas.

Functional Areas

Plant Operations

The number of personnel error type events and noncompliances indicate weaknesses in management controls and training in this area. Several of the noncompliances were repetitive in the area of reporting. Eight reactor trips were caused by personnel errors. Most of these events can be attributed to not following procedures or the lack of training in the procedures. Performance in this area is considered a marginal Category 2. Increased management involvement and control is necessary to improve performance in this area.

Surveillance and Inservice Inspection

Three significant events and six noncompliances have occurred in this area during the period which involved personnel errors and procedural deficiencies. Some of these problems resulted in escalated enforcement actions in the form of enforcement conferences or management meetings on January 13, August 4, November 2, 1981 and March 16, 1982, and the proposal of a Civil Penalty on December 30, 1981. The 12-step corrective action program established October 16, 1981, to upgrade safety performance, appears to have had some effect, as improvements in the reduction of events and noncompliances has been noted in this area. Further management emphasis needs to be applied in this area to assure continued improvements.

Fire Protection

Significant programmatic and management problems exist in this area. An inspection in mid 1981 resulted in a proposed Civil Penalty involving six noncompliances and three material false statements and other minor items. The fire protection program had not been properly implemented due to a lack of management involvement and control. There was a lack of expertise in this area at the site which resulted in major deficiencies going undetected for long periods of time. Corrective actions have not been timely.

Additional attention by both the licensee and NRC is warranted in this area.

Emergency Preparedness

The Emergency Preparedness Implementation Appraisal and exercise early in 1982 resulted in a noncompliance and revealed misrepresentation of facts relative to the state of emergency preparedness of an Emergency Operations Facility. Appropriate escalated enforcement actions are being pursued by the NRC staff. The licensee's management has not been adequately involved in assuring requirements were met. NRC concerns were not resolved and required a special enforcement meeting. Closer management attention is needed in this area.

Licensing Activities

Improvement is needed in the timeliness and quality of responses to NRR issues particularly in the areas of Fire Protection, inservice inspection, and NURG-0737 items.

Quality Activities

Significant problems exist in the implementation of the QA Program as reflected by 17 noncompliances in this area. The majority (12 items) reflect a lack of administrative control in implementing design controls and other commitments. Corrective actions in this area are sometimes ineffective and many times are untimely with little or no followup to assess completeness or effectiveness. Increased management support is needed to assure the implementation of the QA Program with particular emphasis on reviewing existing program interpretations, assessing the adequacy of commitments, and providing timely and effective corrective actions.