

D.C. Cook Staffing LAR

Kevin Simpson

Cook EP Manager

kjsimpson@aep.com

(269)921-2752

Topic 1: On-Shift Staffing

To NUREG-0654 Revision 2 [includes on-shift staffing reductions]

On-shift Staffing

1. Align D.C. Cook **on-shift** to the guidance provided in NUREG-0654 Revision 2:
 - a. No guidance deviations requested for **on-shift** staffing.
 - b. This will result in a reduction to CURRENT on-shift staffing:
 - i. **RP Techs from 3 on-shift to 2 on-shift** (matching Rev 2).
 - ii. **Chem Techs from 2 on-shift to none on-shift** (matching Rev 2).
 - iii. **Maintenance I&C Tech from 1 on-shift to none on-shift** (matching Rev 2).
 - c. These reductions have been evaluated per Appendix E to Part 50 IV.A.9 and are reflected in D.C. Cook's newly revised On-Shift Staffing Analysis (OSA) [which will be included in the submittal].
 - NOTE: This newly revised analysis concluded that the proposed on-shift staff (per NUREG-0654 Revision 2) would be able to perform all ERO functions without the need for augmentation for a full 90 minutes.

Topic 2: Augmenting Staffing

To NUREG-0654 Revision 2 [includes augmenting staffing reductions AND 90-minute time extension for OSC, TSC and EOF]

Augmenting Staffing

2. Align D.C. Cook **augmenting staff** to the guidance provided in NUREG-0654 Revision 2:
 - a. Major Deviation (Augmentation Timing to 90 Minutes):
 - i. Cook Current:
 - 1) EOF/TSC/OSC/ENC full augmentation w/in 60 minutes from Alert
 - ii. 0654 Rev 2:
 - 1) TSC/OSC partial augmentation w/in 60 minutes from Alert
 - 2) TSC/OSC full augmentation w/in 90 minutes from Alert
 - 3) EOF full augmentation w/in 60 minutes from SAE
 - 4) JIC/JIS [ENC at Cook] full augmentation w/in 60 minutes from SAE
 - iii. Cook Proposed:
 - 1) **EOF/TSC/OSC/ENC full augmentation w/in 90 minutes from Alert**

Augmenting Staffing

2. Align D.C. Cook augmenting staff to the guidance provided in NUREG-0654 Revision 2:

a. Major Deviation (Augmentation Timing to 90 Minutes):

iv. General Basis:

- OSA supports on-shift staffing performing ERO functions for 90 minutes.
- EOF is activated 90 minutes after Alert which is more timely than the guidance recommendation of 60 minutes after SAE.
- Activating the TSC and EOF in parallel at an Alert is no change to current ERO processes.
 - EOF will continue to take classification, notification, PAR and dose assessment directly from the Control Room.
 - TSC will continue to act in a support capacity.
- Extending the augmentation timing provides improved access to the most qualified plant personnel (for filling critical roles on the ERO).

Augmenting Staffing

2. Align D.C. Cook augmenting staff to the guidance provided in NUREG-0654 Revision 2:

b. Minor Deviations:

- I. Communications: **Only one communicator in the TSC (for NRC ENS Communications).** No ORO communicators needed in TSC. The EOF augments at the same time as the TSC and the EOF takes the ORO communication function directly from the Control Room.
- II. Supervision of Radiation Protection Staff and Site Radiation Protection: **Title change only.** TSC role is referred to as the Radiological Assessment Coordinator (RAC) and the EOF role is referred to as the Environmental Assessment Coordinator (EAC).
- III. Dose Assessment/Projections: **No dose assessment staff assigned to the TSC.** The EOF augments at the same time as the TSC and the EOF takes the dose assessment function directly from the Control Room

Augmenting Staffing

2. Align D.C. Cook **augmenting staff** to the guidance provided in NUREG-0654 Revision 2:

b. Minor Deviations:

IV. Field Monitoring Teams (FMTs): **No Onsite/Offsite FMT designation. Two FMTs (vice three).**

D.C. Cook is on a relatively small site with very little area needed to be covered by vehicle. The Protected Area is easily traversed by foot. Additionally, there is no Security Access Checkpoint and few roads within the OCA allowing easy access. Finally, half of the EPZ is Lake Michigan. Our current method of performing Field Monitoring via two FMT vehicles has proven to be more than adequate for EPZ and OCA coverage.

V. Information Technology (IT): **No IT lead in the TSC.** IT lead in the EOF will provide coverage necessary based on improved remote IT assistance capabilities from the Corporate IT Help Desk in Columbus, Ohio. EOF IT Lead can provide direct IT assistance remotely as well.

Augmenting Staffing

2. Align D.C. Cook augmenting staff to the guidance provided in NUREG-0654 Revision 2:

c. Proposed ACTUAL Augmented Staffing Reductions:

- I. Communications: Currently 1 NRC ENS Communicator in TSC and 2 ORO Communicators in EOF. Proposed is 1 NRC ENS Communicator in the TSC and 1 ORO Communicator in the EOF. ORO Communications will be via an electronic notification system eliminating the need for two ORO communicator. **Overall reduction of 1 ORO Communicator.**
- II. RP and FMT: Currently 13 RPTs needed (including 3 on-shift RPT) to support both in-plant RP functions and FMT. Proposed is 8 RPTs (including 2 on-shift RPT) to support in-plant. Plus 2 non-RPT plant personnel qualified to fill the FMT function. **Reduction of 5 qualified RPT and adding 2 qualified FMT. Net reduction of 3 RPT/FMT.**

Augmenting Staffing

2. Align D.C. Cook augmenting staff to the guidance provided in NUREG-0654 Revision 2:

c. Proposed ACTUAL Augmented Staffing Reductions:

- III. Repair Activities: Currently 1 Mechanic, 1 Electrician, 1 I&C and 1 Electrician (or I&C). Proposed is to match the guidance in Rev 2 with one from each discipline. **Overall reduction of 1 Electrician (or I&C).**
- IV. Information Technology (IT): Currently one IT Specialist in both the TSC and EOF. Proposed is only one IT in the EOF with support remotely from Corporate IT Help Desk. **Overall reduction of 1 IT Specialist.**

Topic 3: Drive-in Drill

To NUREG-0654 Revision 2 [annual to once per 8-yr cycle]

Drive-in Drill

3. Drive-in Drill Frequency Reduction

- a. Current: Drive-in drill requirement is annually. With call-only drill annually as well. They must be in different semesters.
- b. Proposed: Drive-in drill requirement to 8-yr. With call-only drill increased to quarterly.
- c. Better aligns D.C. Cook with the rest of the industry for “apples to apples” assessment of performance.