



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

November 03, 1999

Mr. R. P. Powers
Senior Vice President
Nuclear Generation Group
American Electric Power Company
1 Cook Place
Bridgman, MI 49106

SUBJECT: D. C. COOK INSPECTION REPORT 50-315/99019(DRP); 50-316/99019(DRP)

Dear Mr. Powers:

This refers to the inspection conducted on August 26 through October 8, 1999, at the D. C. Cook Units 1 and 2 reactor facilities. The inspection was an examination of activities conducted under your license as they relate to compliance with the Commission rules and regulations and with the conditions of your license. Areas reviewed included Operations, Maintenance, Engineering, and Plant Support. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations of activities in progress. The enclosed report presents the results of that inspection.

We noted during this inspection period examples of improved problem identification. For example, your staff appropriately expanded the scope of the root cause investigation on clearance order problems to include recent events which occurred after the root cause analysis was started. We also observed that after a fuse configuration problem was noted on a 600V breaker, your operations staff took prompt action to determine the extent of the condition, including verifying that the previously refurbished 600V breakers had properly installed fuses.

In the operations and maintenance areas, we identified three procedural deficiencies. Two examples were identified in the spent fuel pool cooling system abnormal operating procedures. These procedures had not been updated to reflect the currently installed plant equipment configuration. However, we determined that the procedures could have been performed and satisfactorily accomplished their objectives as written. The third procedural deficiency involved a procedure which was inadequate to the circumstances in that it did not provide guidance to your staff on controlling 600V breaker fuses which were removed as part of the breaker refurbishment process. We concluded that this procedural weakness constituted a Severity Level IV violation of 10 CFR Part 50, Appendix B, Criterion V.

This Severity Level IV violation is being treated as a Non-Cited Violation (NCV). Appendix C of the Enforcement Policy requires that for a Severity Level IV violation to be dispositioned as an NCV, it be appropriately placed in the licensee's corrective action program. Implicit in that requirement is that the corrective action program be fully acceptable. The plant corrective action program was not adequate and has been the focus of significant attention by your staff

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to improve the program. While your staff and the NRC have not yet concluded that the corrective action program is fully effective, the corrective action program improvement efforts are underway and captured in the Restart Plan which is under the formal oversight of the NRC through the NRC Manual Chapter 0350 Process, "Staff Guidelines for Restart Approval." Consequently, these issues will be dispositioned as NCVs.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be placed in the NRC Public Document Room.

Sincerely,

/s/ J. A. Grobe

John A. Grobe, Director
Division of Reactor Safety

Docket Nos. 50-315; 50-316
License Nos. DPR-58; DPR-74

Enclosure: Inspection Report 50-315/99019(DRP);
50-316/99019(DRP)

cc w/encl: A. C. Bakken III, Site Vice President
T. Noonan, Plant Manager
M. Rencheck, Vice President, Nuclear Engineering
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
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MI Department of State Police
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