



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351
December 17, 1999

Mr. R. P. Powers
Senior Vice President
Nuclear Generation Group
American Electric Power Company
500 Circle Drive
Buchanan, MI 49107-1395

SUBJECT: D. C. COOK INSPECTION REPORT 50-315/99020(DRP); 50-316/99020(DRP)

Dear Mr. Powers:

This refers to the inspection conducted on October 9 through November 19, 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.

During this inspection period, we noted that your staff was making progress in resolving some of the issues which had contributed to the extended outage. For example, we observed that a significant milestone was met in the commencement of ice loading activities on the Unit 2 ice condenser. In the area of self-assessment effectiveness, your Performance Assurance group demonstrated a strong questioning attitude in identifying motor operated valve testing issues.


However, examples of inadequate procedure quality and adherence indicate that there are still some problems to be resolved in this area. Your staff identified one example where an Essential Service Water (ESW) system normal operating procedure was partially used without the appropriate reviews to ensure that the partial use did not result in a change of intent to the procedure. We considered the failure to properly review the proposed partial use of the ESW procedure constituted a Severity Level IV violation of 10 CFR Part 50, Appendix B, Criterion V. In addition, the inspectors identified that an Operations Standing Order was used in place of a procedure to provide complex, system-specific plant operating guidance. We concluded that the failure to provide appropriate operating guidance constituted a Severity Level IV violation of 10 CFR Part 50, Appendix B, Criterion V.

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These Severity Level IV violations are being treated as Non-Cited Violations (NCVs). Section VII.B.1.a of the Enforcement Policy requires that for Severity Level IV violations to be dispositioned as NCVs, they are 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 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 enclosures, and your response will be placed in the NRC Public Document Room.

Sincerely,



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
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R. Powers

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