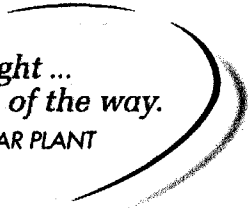


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Every step of the way.*
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American Electric Power

Meeting with

Nuclear Regulatory Commission

Discuss Transition to Oversight Process

**Restarting D. C. Cook
March 10, 2000**



CNP Implementation of the Oversight Process

- **Applying “Best Efforts” to Join New Process**
 - Provide historical data where available
 - Going-forward performance indicator (PI) data collection in most areas by startup
 - » Remaining PIs within two quarters of Unit 2 restart
- **Develop Complete CNP Program Over Six Months Following Unit 2 Restart**
 - “Best Efforts” provides PI data before process established and personnel trained
 - Request limited enforcement discretion until program fully implemented

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Readiness to Provide Historical Data

Cornerstone	Performance Indicator	Historical Data to be Provided	Availability	Reliability	Collection Resource
Reactor Safety - Initiating Events	Reactor Safety - Unplanned Scrams	NO	G	G	B
	Reactor Safety - Scrams with Loss of Normal Heat Removal	NO	G	G	B
	Reactor Safety - Unplanned Power Changes	NO	B	B	B
Reactor Safety - Mitigating Systems	Emergency Power - 2 EDGs (per Unit)	NO	B	B	B
	Pressurized Water Reactor - High Pressure Injection System (HPSI)	NO	B	B	B
	Pressurized Water Reactor - Heat Removal System (AFW)	NO	B	B	B
	Residual Heat Removal System (RHR)	NO	B	B	B
	Safety System Functional Failures	NO	B	B	B
Reactor Safety - Barrier Integrity	RCS Activity	NO	B	B	B
	RCS Leakage	NO	B	B	B
Emergency Preparedness	Emergency Preparedness - Drill/Exercise Performance	NO	R	R	G
	Emergency Preparedness - ERO Drill Participation	YES	G	G	G
	Emergency Preparedness - Alert and Notification System	YES	G	G	G
Occupational Radiation Safety	Occupational Radiation Safety - Occupational Exposure Control Eff.	NO	Y	R	Y
Public Radiation Safety	Public Radiation Indicator - RETS/ODCM Radiological Effluents	YES	G	G	G
Safeguards	Physical Protection - Protected Area Equipment	YES	Y	G	G
	Physical Protection - Personnel Screening Program	YES	G	G	G
	Physical Protection - FFD/Personnel Reliability Program	YES	G	G	G

Collection Barriers

R High

Y Medium

G Low

B N/A

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Readiness to Provide Post-Restart Data

Cornerstone	Performance Indicator	Start Data Submission	Procedure Availability	Org. in Place	Current Collection Status	Training Required	Tools & Other
Reactor Safety - Initiating Events	Reactor Safety - Unplanned Scrams	First Quarter Following Restart	G	G	G	G	G
	Reactor Safety - Scrams with Loss of Normal Heat Removal	First Quarter Following Restart	Y	G	Y	G	G
	Reactor Safety - Unplanned Power Changes	About Six Months After Restart	Y	G	Y	Y	G
Reactor Safety - Mitigating Systems	Emergency Power - 2 EDGs (per Unit)	About Six Months After Restart	Y	Y	Y	Y	Y
	Pressurized Water Reactor - High Pressure Injection System (HPSI)	About Six Months After Restart	Y	Y	Y	Y	Y
	Pressurized Water Reactor - Heat Removal System (AFW)	About Six Months After Restart	Y	Y	Y	Y	Y
	Residual Heat Removal System (RHR)	About Six Months After Restart	Y	Y	Y	Y	Y
	Safety System Functional Failures	About Six Months After Restart	Y	Y	Y	Y	Y
Reactor Safety - Barrier Integrity	RCS Activity	First Quarter Following Restart	G	G	G	G	G
	RCS Leakage	First Quarter Following Restart	G	G	G	G	G
Emergency Preparedness	Emergency Preparedness - Drill/Exercise Performance	First Quarter Following Restart	G	G	G	G	G
	Emergency Preparedness - ERO Drill Participation	First Quarter Following Restart	G	G	G	G	G
	Emergency Preparedness - Alert and Notification System	First Quarter Following Restart	G	G	G	G	G
Occupational Radiation Safety	Occupational Radiation Safety - Occupational Exposure Control Eff.	First Quarter Following Restart	Y	G	G	Y	G
Public Radiation Safety	Public Radiation Indicator - RETS/ODCM Radiological Effluents	First Quarter Following Restart	G	G	G	G	G
Safeguards	Physical Protection - Protected Area Equipment	First Quarter Following Restart	Y	G	G	G	G
	Physical Protection - Personnel Screening Program	First Quarter Following Restart	G	G	G	G	G
	Physical Protection - FFD/Personnel Reliability Program	First Quarter Following Restart	G	G	G	G	G

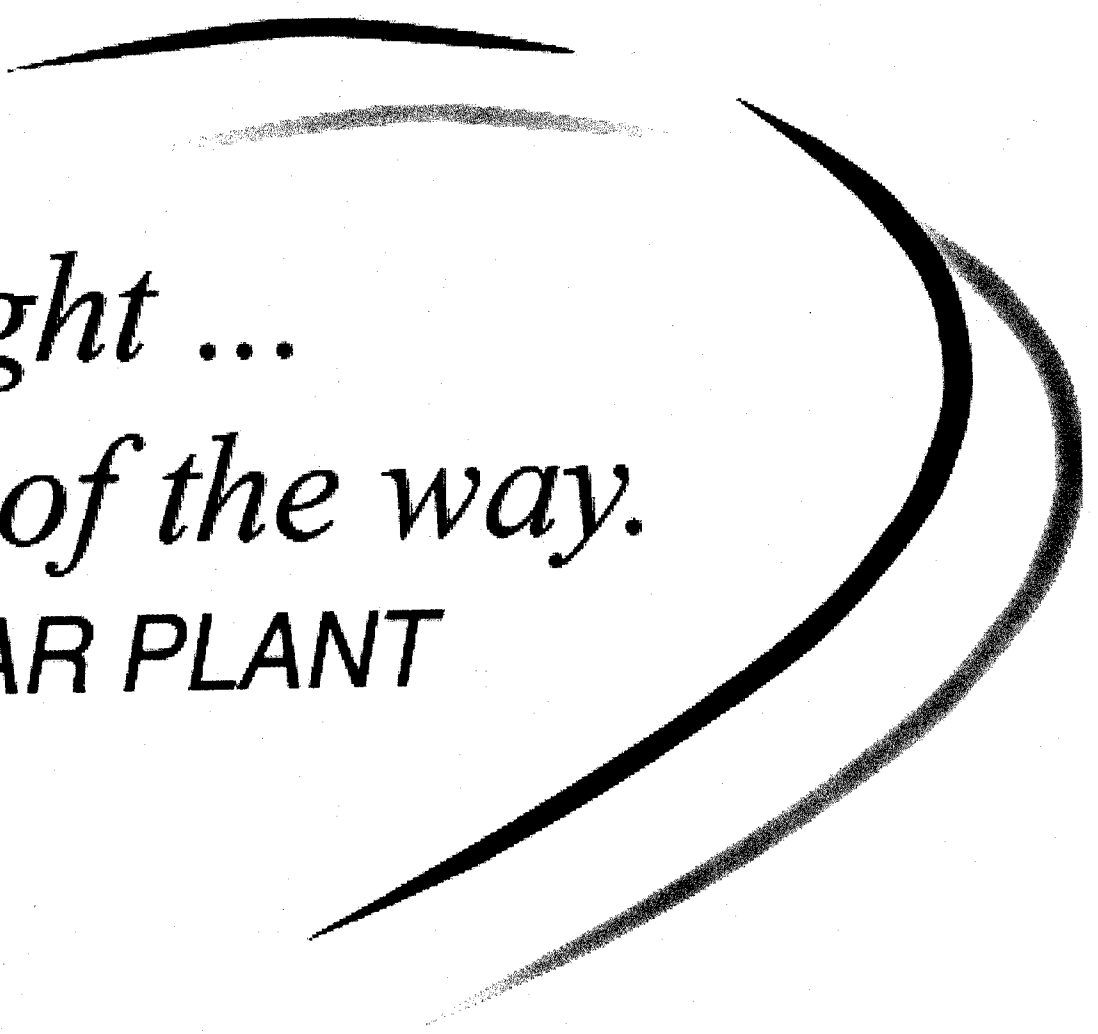
High-effort
Implementation
Period

Y Medium

G Short

Transition to the New Process

- **Implement Aspects of the New Oversight Process**
 - Aggressive implementation may result in errors
 - » Timely correction if errors found
 - “Best Efforts” data collection through implementation
 - » Implementation about six months after Unit 2 restart
- **For Plant Leaving 0350 Process, PI Performance Treated as “Green” Unless Actual Demonstrated Performance < Green**
 - Acknowledges plant inspected to be “restart ready”
 - Performance decline to drive > baseline inspection
- **Stay Under MC 0350 Process Until Transition Complete**
 - Remain in MC 0350 through power ascension testing Unit 1
 - Need to understand timing, basis and impact of final transition



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