

CMB 2RF



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

JUN 20 2000

Beckman and Associates, Inc.
Attn: Vicki Beckman
1071 State Route 136
Belle Vernon, PA 15012

SUBJECT: "TASK ORDER NO. 081 "REVIEW AND RESOLUTION OF ALLEGATION
CONCERNS FOR D.C. COOK ENGINEERING CORRECTIVE ACTION TEAM
INSPECTION" UNDER CONTRACT NO. NRC-03-98-021

Dear Ms. Beckman:

This confirms the verbal authorization that I gave to you on June 2, 2000, and June 9, 2000, with a temporary ceiling of \$9,790.35. In accordance with Section G.5, Task Order Procedures, of the subject contract, this letter definitizes the subject task order. The effort shall be performed in accordance with the enclosed Statement of Work.

Task Order No. 081 shall be in effect from June 5, 2000, through June 12, 2000, with a cost ceiling of \$9,790.35. The amount of \$9,521.46 represents the estimated reimbursable costs, the amount of \$268.89 represents the fixed fee.

Accounting data for Task Order No. 081 is as follows:

B&R No.:	020-15-103-105
Job Code:	J-2548
BOC:	252A
APPN No.:	31X0200.020
FFS#:	NRR98021081
Oblig. Amt.:	\$9,790.35 (inclusive of the temporary ceiling)

The following individual is considered to be essential to the successful performance for work hereunder: [REDACTED]. The Contractor agrees that such personnel shall not be removed from the effort under the task order without compliance with Contract Clause H.4, Key Personnel.

The issuance of this task order does not amend any terms or conditions of the subject contract.

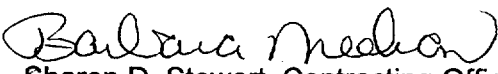
Your contacts during the course of this task order are:

Technical Matters: Edmund Kleeh
Project Officer
(301) 415-2964

Contractual Matters: Mona Selden
Contract Specialist
(301) 415-7907

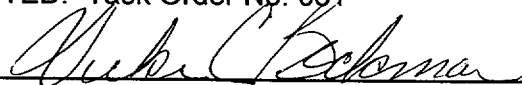
Acceptance of Task Order No. 081 should be made by having an official, authorized to bind your organization, execute three copies of this document in the space provided and return two copies to the Contract Specialist. You should retain the third copy for your records.

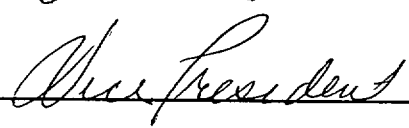
Sincerely,

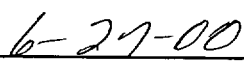

Sharon D. Stewart, Contracting Officer
Contract Management Branch 2
Division of Contracts and Property Management
Office of Administration

Enclosure: Statement of Work

ACCEPTED: Task Order No. 081


NAME


TITLE


DATE

STATEMENT OF WORK

Task Order 081

TITLE: Review and Resolution of Allegation Concerns for D. C. Cook Engineering Corrective Action Team Inspection

DOCKET NUMBER: 50-315/316 B&R NUMBER: 020-15-103-105 JOB CODE: J-2548
INSPECTION REPORT NUMBER: 50-336/

NRC PROJECT OFFICER: E. A. Kleeh, NRR (301) 415-2964
TECHNICAL MONITORS: Martin Farber, RIII (630) 829-9734
Zelig Falevtis, RIII (630) 829-9717
Ron Gardner, RIII (630) 829-9751

PERFORMANCE PERIOD: June 05, 2000 - June 12, 2000

BACKGROUND

An NRC design (AE) inspection completed in September 1997, identified issues that resulted in operability concerns for safety related systems and components. The licensee voluntarily shutdown both units of the D. C. Cook plant and identified required corrective actions in a letter to the NRC. CAL 97-011 dated September 19, 1997 formalized the commitment for the licensee to remain shutdown until compensatory actions were undertaken. Subsequently the licensee by self-assessments and the NRC by additional inspections identified more performance issues that were incorporated into a pre-startup checklist attached to a letter sent from NRC to licensee on July 30, 1998. The items on that checklist had to be resolved by licensee as prerequisites to startup of either D.C. Cook unit. A ECATI inspection was performed in December of 1999 to determine the status of licensee corrective actions for those issues contained on that checklist and to verify their acceptability; to evaluate if licensee was maintaining its design basis; and to ensure the operability of the selected safety systems in accordance with maintained design basis. Some performance issues resulted from that inspection, and also some related allegation concerns were independently identified, not related to any inspection concerns directly, but to the subject matter of the performance issues.

OBJECTIVE

The objective of this task order is to obtain expert technical assistance in the area of electrical design. One specialist is needed to assist the NRC in the resolution of performance issues arising from the Engineering Corrective Action Team Inspection performed at D. C. Cook in November and December of 1999, and independently identified allegations concerns somewhat related to the subject matter of the performance issues. The specialist should primarily have a design background in his area of expertise, such as from an architect-engineer firm with experience in design and system operational requirements. The specialist should also be familiar with the installation and surveillance testing of equipment; and how the engineering, operations, and corrective-action programs normally function and internally improve themselves. The specialist should be thoroughly familiar with NRC regulations, closure of CALs, resolution of engineering follow up and evaluation items, allegation process along with resolution of allegation concerns, and overall NRC inspection methodology.

The specialist should be familiar with the regulatory process, and should be able to determine relevant regulatory commitments from docketed licensee correspondence for their assigned review areas. The specialist should be able to verify implementation of the licensee's commitments, assess the effectiveness and adequacy of the licensee's corrective-actions, determine if licensee is maintaining the appropriate design basis taking into account design changes and modifications, and evaluate the overall performance and acceptability of broad programmatic areas like the engineering, operations, and corrective-action programs. This review will be conducted in accordance with IP 37550 "Engineering," IP 37700 "Design Changes and Modifications," 40500 "Effectiveness of Licensee Process to Identify, Resolve, and Prevent Problems," IP 92903 "Follow up - Engineering," and Management Directive 8.8 "Management of Allegations."

It shall be the responsibility of the contractor to assign technical staff, employees, and subcontractors, who have the

required combination of educational background and experience to meet both the technical and regulatory objectives of the work specified in this Statement Of Work (SOW). The NRC will rely on representation made by the contractor concerning the qualifications of the personnel proposed for assignment to this task order including assurance that all information contained in the technical and cost proposals, including resumes and conflict of interest disclosures, is accurate and truthful.

WORK REQUIREMENTS AND SCHEDULE

The contractor shall provide the qualified specialist, and the necessary facilities, materials, and services to assist the NRC staff in preparing for, conducting, and documenting the inspection activities and findings. The contractor shall provide the latest rad-worker training and MMPI test dates of the specialist to the Project Officer. Several Technical Monitors have been identified for this task and they are Martin Farber, Zelig Falevtis, and Ron Gardner. The Technical Monitors may issue technical directions and instructions during the duration of this task order that are in accordance with the SOW; and they shall not constitute new assignments of work, or changes in cost or period of performance. In addition, the specialist should take any additional instructions from the Senior Resident at D. C. Cook in accordance with the SOW. The contractor shall refer to the basic contract for further information and guidance on any technical directions issued under this task order.

Modifications to the scope of work, costs, or period of performance of this task order must be issued by the Contracting Officer and will be coordinated with the NRR Project Officer.

Specific Tasks

Schedule Completion

- | | |
|---|---|
| <p>1. Develop an understanding of the performance issues related to the ECATI and the allegation concerns and then outline a plan for their resolution.</p> <p>a. The specialist may be required to review applicable CALs issued to the licensee, NRC inspection reports, and LERs.</p> <p>b. Request a copy of allegation (R3-00-A-0106), applicable CALs, inspection reports, LERs, design documents, etc in order to understand the subject matter of the allegation concerns and performance issues and any relevant history</p> <p>c. The specialist may take technical guidance from any of the Technical Monitors or Senior Resident at D. C. Cook in regard to understanding the scope of allegation concern or the NRC's process for resolving allegation concerns.</p> | <p>1. At D. C. Cook site on or about June 05 - 06, 2000.</p> |
| <p>2. Resolution of Allegation Concerns</p> | |
| <p>a. Make queries to the licensee about the allegation concerns consistent with the intent of this task.</p> | <p>2. Specialist will begin resolution of allegation concern probably about June 07 - 08, 2000 while onsite at D. C. Cook. The specialist</p> |

is allowed additional hours to complete resolution of allegation concerns and performance issues in his home office on June 10 - 11, 2000.

b. Respond in a timely manner to licensee's responses to queries made in 2.a.

c. Determine in regard to performance issue the following:

1. If components housed in safeguards test cabinet are routinely relied upon as part of ESF signal circuitry?.

2. Will failure of said components inhibit an ESF actuation signal?

3. What are alternatives for resolving any concerns that arise from review of performance issue and which one the licensee is going to place in its corrective action program.

d. For allegation concern, specialist should verify that he understands the issue and discuss with Senior Resident his plan for evaluation and resolution of the concern.

e. For the allegation concern, the specialist should determine if he has addressed all aspects of it in regard to its technical merit and whether licensee has taken appropriate actions. He should also verify whether allegor was or was not discriminated against after making the allegation.

3. Prepare the feeder report to be part of Senior Resident's monthly report in accordance to directions of Senior Resident.

a. Follow the guidelines of NRC INSPECTION MANUAL , Manual Chapter 0610, "Inspection Reports." unless otherwise directed by Technical Monitor or Senior Resident.

b. Feeder report or applicable

3. The specialist will inform both one of the Technical Monitors and the Senior Resident about his preferred resolution of the allegation concerns and the performance issue, and provide the feeder report input required by Senior Resident no later than June 12, 2000.

documentation required by Technical Monitor or Senior Resident should discuss specialist's activities, be concise, and focus on resolution of allegation concern and the performance issue.

NOTE: Prior to the start of this task, the contractor's staff is required to be available to coordinate aspects, such as travel logistics, with the Technical Monitor.

REPORT REQUIREMENTS

Technical Report/ Documentation to Address Resolution of Allegation Concern

At the completion of Task 1, the contractor's specialist shall provide a plan to address the resolution of the allegation concern and performance issue to the Senior Resident. The format and scope of this input shall be as directed by the NRC Technical Monitors or Senior Resident.

During Task 2, the contractor's specialist shall provide daily input to the Senior Resident. The format and scope of this input shall be as directed by the Senior Resident.

At the completion of Task 2 (prior to the NRC debriefing the licensee), the contractor's specialists shall provide a summary of how resolution of allegation was addressed and pertinent topics including the resolution of performance issue to the D.C. Cook Senior Resident. The format and scope shall be as directed by the Senior Resident. Typically, this input will consist of an electronic version (WordPerfect file on diskette) of the specialist's activities and resolution of concerns.

At the completion of Tasks 3, the contractor shall send a copy of the final inspection report input (feeder report) or documentation for resolution of allegation concern and performance issue to the NRC Project Officer and the original and one computer diskette version (WordPerfect 6.1 or other IBM PC compatible software acceptable) to the Senior Resident. The format and scope of the final report inputs shall be in accordance with the guidance in NRC Inspection Manual Chapter 0610 or as directed by the Senior Resident.

A specialist's feeder report or documentation requested by Technical Monitor/Senior Resident will serve as documentation of the specialist's activities, effort, and findings, and will be used by the Senior Resident for the preparation of his monthly inspection report. The form and scope of the final report input shall be in accordance with the guidance in NRC Inspection Manual Chapter 0610 or as directed by the Senior Resident. As a minimum, specialist's report input shall include the following:

- Identity of the individuals (name, company, and title) that provided information to the specialist during the inspection.
- For allegation concern or performance issue, a description of the activities and general findings and conclusions reached regarding the adequacy of the area.
- For each area with a concern or findings, a discussion of the concerns or findings with technical bases.

NOTE: The contractor is not required to undertake any further efforts toward report finalization except as directed by Senior Resident and as stated in the SOW. For example, management review of the feeder report beyond its submittal to the NRC Team Leader and Project Officer is not needed.

Business Letter Report

The contractor shall provide monthly progress reports in accordance with the requirements of the basic contract.

MEETINGS AND TRAVEL

For estimating purposes, the following meetings and travel are anticipated:

One, one-person, 5 day trip to the D. C. Cook site near Benton Harbor, Michigan to conduct the onsite phase of the resolution of allegation concern on or about June 05 - 09, 2000.

NOTE: The contractor's staff shall coordinate all travel arrangements in advance with one of the NRC Technical Monitors.

NRC FURNISHED MATERIAL

Documents required to prepare for this review will be provided by the NRC Technical Monitor or the D. C. Cook Senior Resident.

OTHER APPLICABLE INFORMATION

The work specified in this SOW is 100% licensee fee recoverable. The contractor shall provide fee recovery information in the monthly progress reports in accordance with the requirements of the basic contract.

The contractor's specialist assigned to this task order will have to be badged for unescorted access privilege at the plant site. The contractor shall provide all documentation required for badging (as identified by the Senior Resident) at the plant site. Questions concerning badging and the plant site access shall be addressed to the NRC Technical Monitor or Senior Resident.