

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION III 801 WARRENVILLE ROAD LISLE, ILLINOIS 60532-4351

January 09, 2000

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

SUBJECT: SUMMARY OF THE OCTOBER 28, 1999, D. C. COOK PUBLIC MEETING

Dear Mr. Powers:

On October 28, 1999, the Nuclear Regulatory Commission (NRC) held a public meeting at the D.C. Cook Nuclear Power Plant in Bridgman, Michigan. The meeting was held to discuss D.C. Cook restart and NRC Manual Chapter (MC) 0350 oversight inspections. Formal presentations were made by the Indiana Michigan Power Company (licensee) staff. Enclosure 1 is a list of attendees of the meeting, and a copy of the slides used by the licensee is provided as Enclosure 2.

The MC 0350 public meetings between the licensee and the NRC staff are designed to provide a mechanism for the exchange of information and an update on the status of the readiness of the units at D. C. Cook to restart. High-level management from the NRC and the licensee participated in the meetings.

The licensee's presentations at the October 28, 1999, meeting provided the status of the Case Specific Checklist items, the revision to the Restart Plan, Operations Department readiness for restart, and Performance Assurance audit status and findings.

Mr. Bakken stated that the plant continues to make progress toward restart. Entry into Mode 2 (Startup) for Unit 2 slipped back approximately 2 weeks due to difficulties with ice condenser work and resolution of engineering related issues. Mr. Harland stated that Unit 2 was currently scheduled to enter Mode 2 on February 6, 2000; and full power was scheduled for February 18, 2000. Mr. Harland stated that up to 125 more contractors would augment the maintenance department staff to support Unit 2 restart. Mr. Harland compared the LaSalle Unit 2 Nuclear Plant schedule progress chart (when LaSalle Unit 2 was in a similar restart situation) with the D. C. Cook chart and noted similar trends regarding progress toward restart.

Mr. Harland discussed the status of the 218 actual or potential plant modifications to be implemented prior to restart. Mr. Harland stated that 127 of the modification packages were delivered to the field or currently scheduled. At least 17 of the modifications were considered major modifications (schedules needed); 9 of the modifications were on hold pending evaluation. Mr. Harland stated that challenges included engineering deliverables, schedule adherence, and doing it right the first time. (Mr. Pollock commented that maintenance department personnel created a rework program to evaluate maintenance failures and that the

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Performance Assurance organization would evaluate the program's effectiveness.) Items which could potentially impact the schedule included motor-operated valves, equipment qualification, high energy line breaks, lake water temperature (summer restraint), and electrical distribution. Licensee and NRC personnel discussed the schedule for the motor-operated valve inspection, which was changed from mid-December 1999 to mid-January 2000.

Mr. Godley discussed closure of the Confirmatory Action Letter. The licensee's October 25, 1999, letter documented the licensee's position that Confirmatory Action Letter Items 2, 5, and 6 were closed. The licensee submitted a Technical Specification change as part of the resolution of Confirmatory Action Letter Item 1. The licensee has determined that the actions required to address Confirmatory Action Letter Item 3 are not consistent with the current licensing basis. The licensee and the NRC intend to discuss this issue more fully. Emergency operating procedure validation would address Confirmatory Action Letter Item 4. The licensee is developing a containment cleanliness standard to fully address Confirmatory Action Letter Item 7. The licensee has addressed the specific issue regarding Confirmatory Action Letter Item 8, but is re-baselining control room and offsite dose calculations as part of a broader corrective action. Mr. Godley stated that Confirmatory Action Letter Item 9 would be addressed by the currently committed date of December 31, 1999.

Mr. Godley discussed the Restart Action Plan progress and Performance Chart. In addition, Mr. Godley discussed key licensing activities and changes. The licensee was currently working an undervoltage setpoint change Technical Specification Amendment request and expects to send the submittal to NRC on November 9, 1999. Also, Mr. Godley stated that the licensee was re-baselining the entire electrical distribution system and NRC involvement may be needed to review switchvard modifications.

Mr. Godley discussed the NRC performance assessment process with the new inspection program. The NRC data was predicated on 1 year's worth of data for analysis. The licensee requested that they not be included in the new inspection program since there would be no meaningful operating data. The licensee discussed this issue with personnel at the Nuclear Engineering Institute, which from the NRC's perspective was the correct course of action. The NRC took action to respond to the licensee on this request. Mr. Godley also stated that they will request that the update to the Final Safety Analysis Report that is due 30 days after restart of the first unit be delayed for 6 months. The reason was there is a significant number of changes.

Mr. Godley also requested clarification of the following statement taken from minutes from a July 9, 1998, public meeting: "The NRC requested and you [licensee] committed to provide the NRC with documentation for any operability or safety evaluations completed prior to plant startup." The NRC stated that this commitment was no longer necessary. The licensee agreed to make available for NRC review any operability or safety evaluation requested by NRC.

Mr. Pollock discussed performance indicators and the closure process for Performance Assurance department oversight activities. In addition, Mr. Pollock discussed performance in the engineering, operations, maintenance, and plant support departments. Specific items discussed included review of a Sargent and Lundy calculation assessment report, follow up on

significant findings from the Expanded System Readiness Reviews, and Restart Action Plan root cause and corrective actions.

Mr. Noonan discussed the vision of the Operations Department, which involved safety consciousness, leadership, knowledge and skills, and a self-critical organization. Mr. Noonan also discussed the plant transition to operations, including the sequence of events for turnover of systems to Operations Department personnel. This entailed:

- Verifying field work complete
- Postmaintenance and postmodification tests performed
- Paperwork complete
- System walkdowns complete
- Clearances reviewed
- System engineering final readiness report complete
- Enhanced system readiness review report complete.

Mr. Noonan stated that around-the-clock coverage would be provided by departmental level managers through entry into Mode 4 (Hot Standby).

Mr. Broadwater discussed modification installation and testing, including the restart and power ascension testing program. Mr. Broadwater stated that the installation and test program would incorporate the best practices and lessons learned from the Salem Nuclear Plant, which experienced a similar restart effort. Mr. Broadwater stated that the key program elements included test phases at the component level, system level, integrated function level, and the power ascension level. The startup support team would consist of the shift plant manager, the shift engineering support manager, the modification installation and testing manager, and the shift test engineer.

Mr. Bakken closed the licensee's presentation with a discussion of the status of key activities. This included the ice condenser, the corrective action program, and the emergency operating procedures upgrades. Finally, Mr Bakken discussed the next steps toward restart, which included closeout of the Confirmatory Action Letter and safe completion of work for restart with quality results.

Sincerely,

John A. Grobe, Director Division of Reactor Safety

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

Enclosures: 1. List of Meeting Attendees

2. Licensee's Slide Presentation

See Attached Distribution

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Mr. Bakken closed the licensee's presentation with a discussion of the status of key activities. This included the ice condenser, the corrective action program, and the emergency operating procedures upgrades. Finally, Mr Bakken discussed the next steps toward restart, which included closeout of the Confirmatory Action Letter and safe completion of work for restart with quality results.

Sincerely,

/s/ J. Grobe

John A. Grobe, Director Division of Reactor Safety

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October 28, 1999, Meeting Attendees List

NRC

Bruce Bartlett, SRI D. C. Cook
Kevin Coyne, RI D. C. Cook
Claudia Craig, Section Chief, PD-III, DLPM, NRR
Marty Farber, Senior Reactor Inspector, Division of Reactor Safety
Jack Grobe, Director, Division of Reactor Safety
Dave Passehl, Project Engineer, Division of Reactor Projects
John Stang, Project Manager, NRR
John Zwolinski, Director, Division of Licensing and Project Management, NRR

AEP

Chris Bakken, Site VP Joseph Broadwater, Manager, Modification Installation and Testing Thomas A. Craig, Operations Julie Cunningham, Nuclear Financial Documents Rob W. Gaston, Regulatory Affairs Robert C. Godley, Director Regulatory Affairs Gary Harland, Manager, Outage/Work Control David W. Jenkins, Legal Department, Others Wayne Kropp, Performance Assurance James F. Labis, Environmental Compliance Mark Marano, Dir. Business Services Richard Meister, Regulatory Affairs Joseph E. Pollock, Director, Performance Assurance Tom Quaka, Nuclear Safety Assessment Mike Rencheck, VP Engineering John R. Sampson, President Indiana and Michigan Power Keith Steinmetz, Regulatory Affairs Lanny Thornsbury, Systems Engineering Manager Barry Wallace, Training Manager Larry Weber, Operations Manager

Others

Peter A. Moeller, Consultant Thomas P. Noonan, Plant Mgr./Restart Dir. Perry Robinson, Hopkins & Sutter Dan Salter, HGP, Inc.



Restarting D. C. Cook October 28, 1999



AEP. America's Energy Partner

The for reactions

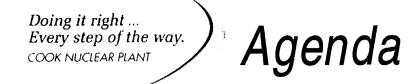
American Electric Power

Meeting with

Nuclear Regulatory Commission

Restarting D. C. Cook October 28, 1999





■ Introduction Chris Bakken

■ Schedule Status Gary Harland

■ Regulatory Activities Robert Godley

Oversight Activities
Joseph Pollock

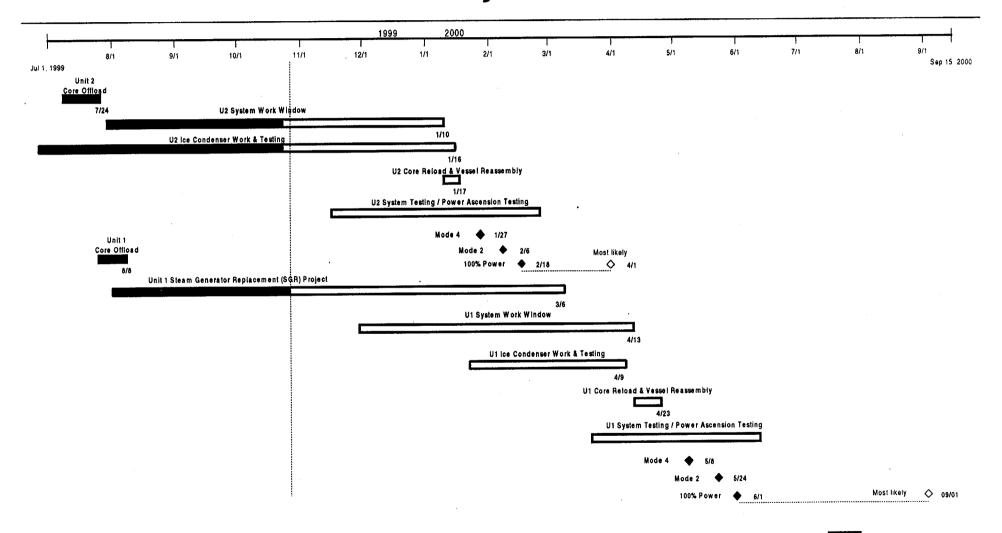
■ Transition to Operations Tom Noonan

■ Restart & Power Ascension Joseph Broadwater Testing Program

■ Wrap-up Chris Bakken



Current Status -Overall Project





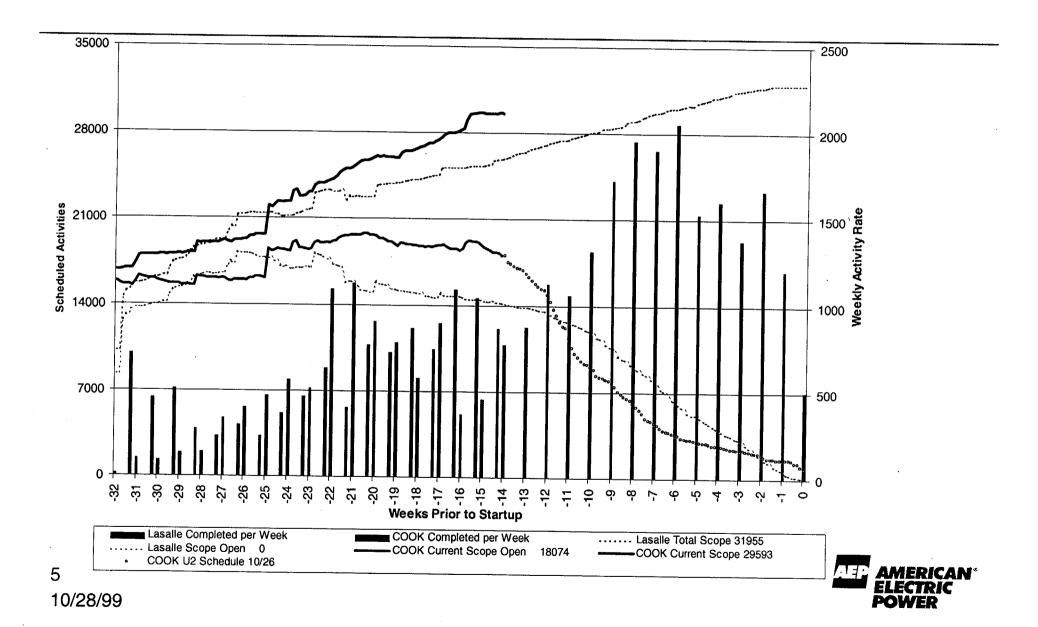
Schedule Status

Gary Harland

Director - Work Control



Schedule Progress



Status of Plant Modifications

■ Total Discovery Modifications	272	
■ Screened Out	-31	
■ Post Restart	-23	
Actual / Potential Modifications	218	
■ Delivered to Field	54	
■ Currently Scheduled	73	
Schedules Needed - Major	17	
Schedules Needed - Minor	16	
■ On Hold	9	
	169	•
■ Re-evaluations	<u>49</u>	
	218	III AMERICAN

Current Status - Summary

- Challenges
 - Engineering Deliverables
 - Schedule Adherence
 - Doing It Right the First Time
- Potential Schedule Effects

✓ February 6th - Mode 2 Target >



Regulatory Activities

Robert Godley

Director - Regulatory Affairs



Closure of the Confirmatory Action Letter

Confirmatory Action Letter

Future Closure(s) Issues 1, 4*, 7, and 9*

Confirm Closure of Issues 3 and 8

October 25th Submitta

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* Currently in 0350 Process

CAL Issues:

- 1. Recirculation Sump Inventory
- 2. Recirculation Sump Venting
- 3. 36 Hour Cooldown with One Train of Cooling
- 4. Switchover to Recirculation Sump
- 5. Compressed Air Overpressure
- 6. Residual Heat Removal Suction Valve Interlock
- 7. Fibrous Material
- 8. Refueling Water
 Storage Tank Mini-flow
 Recirculation Lines
- 9. Instrument Uncertainties



RESTART ACTION PLAN (RAP) PROGRESS AND PERFORMANCE CHART 0350 RESTART ISSUES

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3 A B	S. Farlow / W. Eifert R. Grumbir J. Kovarik	99.0594 98.3291 97.2312	9/8/99 10/6/99 9/15/99	10/12/99 9/16/99 9/2)/99	10/12/99 9/19/99 9/24/99	10/13/99 9/17/99 9/24/99	10/15/99			85 60 85			0/33	•				< 11/15/99 < 11/15/99 < 11/15/99	11@8 1201 11@8 1201	
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1. Programmatic Breakdown in Surveillance Testing

- A. Inadequate Instructions in Surveillance Tests
- B. Acceptance Criterion Leck Sufficient Margin to Analysis Limit C. Failure to Meet Technical Specification Requirements
- D. Preconditioning of Equipment Prior to Surveillance Testing
- E. Failure to Assess and Control the Quality of Contractors
 Performing Surveillance Testing
- 2. Corrective Action Program Breakdown
 3. Programmatic Breakdown in the Maint, of the Design Basis
 A. Inadequate Design Control

 - 8. Failure to Update UFSAR
 - C. Failure to Consider Instrument Uncertainties
 D. Consideration of System/Component Failure Modes

- Safety Evaluations

- omisty retrieations.
 Operator Training issues
 Resolution of toe Condenser issues
 Resolution of Mon-Safety Related Cables Going to Shunt Trip Colls
 Resolution of Hydrogen Recombinar Operability Issues

- Resolution of Distributed Ignition Technical Specification Issue
 Resolution of Containment Spray System Operability Issues
 Resolution of Hydrogen Mitigation System Operability and Mat'l Condition Issues
- Resolution of Containment Liner Pitting
- Systems and Containment Readiness Assessments

- 14. Programmatic Readiness Assessment
- A. Programmatic Problem Discovery
 B. Contractor Control Program
- C. Preventive Maintenance Program
- D. Emergency Operating Procedures Program
 E. Electrical Protection Coordination Including Fuse/Breaker Control Program
- F. Operability Determination Program
 G. Programmatic Final readiness Reviews
- 15. Functional Area Readiness Assessment
 15. Resolution of Operability of MOVs in the GL 89-10 Program

Key Licensing Activities - License Changes

#	Subject	Unit(s)	Final Inputs to Licensing	Submittal Drafted	PORC Meeting	NSDRC Meeting	NRC Submittal Date	NRC RAI	AEP Response to RAI	NRC Approval/ Concurrence Required By	Mode Constraint	Licensing Lead(s)
1	Rod Insertion - Switchover USQ	1&2	Complete	Complete	Complete	Complete	9/17/99	10/20/99	11/1/99	12/2/99	Mode 3	Raleigh
. 5	Post Accident Containment Sump Inventory Issues (Sump Level, RWST Volume, Ice Mass & Melt Rate) – Cal Item #1	1&2	Complete	Complete	Complete	Complete	10/1/99	10/27/99	11/10/99	12/13/99	Mode 4	Wadkins
3	Containment Spray Pump/ Spray Additive Flow Surveillance Change to Standard Tech Spec	1&2	Complete	Complete	Complete	Complete	10/12/99	11/1/99	11/15/99	12/10/99	Mode 4	Cribbe
4	Under Voltage Set Point Changes - Methodology,Scope, and Amendment Request - Phase I	2	Complete	Complete	10/29/99	11/5/99	11/9/99	TBD	TBD	12/20/99	Mode 4	Kohler
	Under Voltage Set Point Changes - Final Calculations and Value - Phase II		Draft 10/28/99 Final 11/11/99	11/8/99	11/12/9 9	11/17/9 9	11/22/99	TBD	TBD			
5	Accumulator Isolation Valve Breaker Rackout	1&2	Complete	Complete	Complete	Complete	11/1/99	TBD	TBD	TBD	Mode 3	Rhodes
			UNIT 1 Stea	m Generato	r Repair Pro	ect Related						100
6	Heavy Loads (SGRP)	1	Complete	Complete	Complete	Complete	9/23/99	10/18/99	11/1/99	12/7/99	Movement of SG Loads	Inserra/Till
7	RCS Chemistry Sampling in Modes 5 & 6	1&2	Complete	Complete	Complete	Complete	9/10/99	10/11/99	10/25/99	11/22/99	RCS Pipe Cuts on Unit 1	Haggerty
8	ZIRLO Fuel Cladding Amendment	1	Complete	Complete	Complete	Complete	11/1/99	11/15/99	11/29/99	2/15/99	Receipt of New Fuel	Wadkins
9	RCS Volume - SGRP (A standard Tech Spec Change is being prepared to eliminate RCS Volume in Section 5 and the need for this submittal)	1&2	12/17/99	1/6/00	1/14/00	1/19/00	1/25/00	2/24/00	3/10/00	3/23/00	Mode 4	Inserra/Till



Next Steps

■ Potential Issues

■ NRC Performance Assessment Process

■ FSAR Update



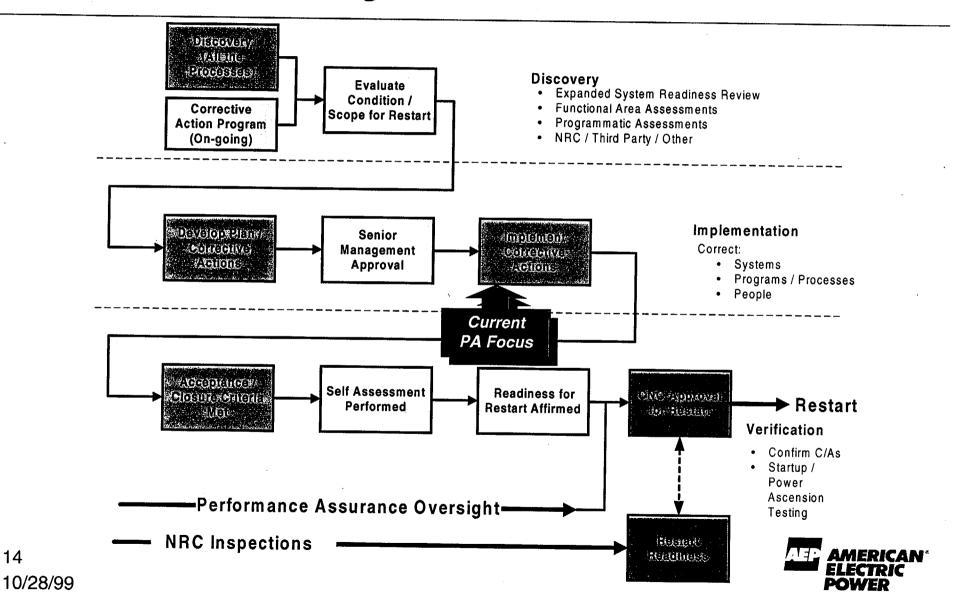
Startup & Test Program

Joseph Pollock

Director - Performance Assurance



Closure Process - Oversight Activities



Performance Indicators

G Excellent

γ Meets Standards

R Needs Improvement

W No Data Available



Departmental Performance - Engineering

■ Sargent & Lundy Calculation Assessment Report

■ Follow-up on Significant ESRR Findings

■ Specific 0350 Hardware Issues



Departmental Performance - Operations

■ Clearance Program

■ EOP Verification and Validation

■ Conduct of Operations Activities

Operability Determinations



Departmental Performance - Maintenance

Contractor Control

■ Work Practices

■ Implementation of On-line Work Control Process



Departmental Performance - Plant Support

■ Corrective Action Program

■ Fitness For Duty

■ Emergency Planning



Departmental Performance - Transition to Operations

■ Increased Field and Control Room Observations

■ System Turnover

■ Mode Change Assessments



Transition to Operations

Tom Noonan

Restart Director



Operations: Vision

- **■** Safety Consciousness
- **■** Operations Leadership
- Self-Critical Organization
- High Level of Knowledge & Skills

✓ Operations Stands for Safety >



Transition to Operations - People

■ Human Performance

■ Skills Development

■ Knowledge & Use of Procedures / Processes



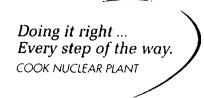
Transition to Operations Leadership

■ Operations Setting the Standards

Organizational Structure Developed

■ Integrated Resource Loaded Schedule





System Turnover to Operations - Sequence of Events

- Assigned Restart Unit 2 Items to Owners
- Completing the Work
- **■** Testing the Equipment
- Documenting the Results
- **Turning Over to Operations**



Operations Leading Plant Restart

- Readying the Plant for Operations
- Completing the Training
- Affirming the Systems & People for Restart
- **■** Establishing Management Oversight
- Monitoring for Results
 - ✓ Operations Will Be Ready
 To Lead The Way >



Restart And Power Ascension Testing Program

Joseph Broadwater

Modification Installation and Testing Manager



Restart And Power Ascension Testing Program

- Key Program Elements
- Program Scope
- **Implementation Phase**

✓ Safe, Controlled and Deliberate
 Restart of D. C. Cook Unit 2 >>



Key Program Elements

- System Readiness Review Board (SRRB) Approved Concept
- Proceduralized in the Startup And Power Ascension Testing Program
- Test Review Board (TRB) Established
- Test Phases



Program Scope

■ System Test Plan Development & Content

- Table 1 : Matrix of DCPs
- Table 2 : Matrix of Job Orders (JO)
- Table 3: Industry Experience and Commitments
- Table 4 : Additional Testing /Restart and Power Ascension Testing



Program Scope (cont.)

- Summary: Why The System Is Ready For Startup
- System Test Plan Review And Approval
- **Test Review Board Charter**
- Test Review Board Members



Implementation Phase

- Program Management And Support Organization
- Startup Support Team
 - Shift Plant Manager
 - Shift Engineering Support Manager
 - Modification Installation and Testing Manager
 - Shift Test Engineer
- Startup & Power Ascension Sequencing Procedure



Chris Bakken

Site Vice President



Status of Key Activities

■ Ice Condenser

■ Corrective Action Program

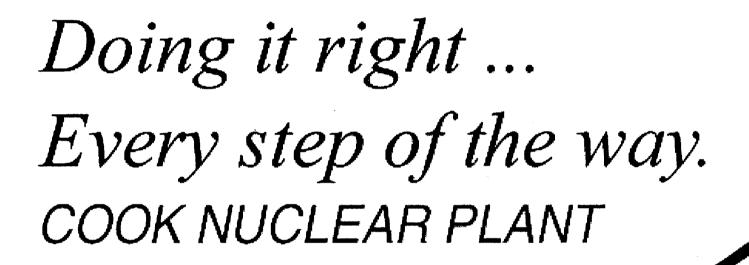
■ Emergency Operating Procedures



Next Steps

- **Close the Confirmatory Action Letter**
- Safely Complete the Restart-required Work
- Assure Quality Results
- Seek the Regional Administrator's Concurrence for Restart





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

Emergency Management Division MI Department of State Police

D. Lochbaum, Union of Concerned Scientists

Distribution:

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