

American Electric Power

Meeting with

Nuclear Regulatory Commission

Discuss Transition to Oversight Process

Restarting D. C. Cook February 15, 2000



Cook Activities Impacting Participation in Oversight Process

- Shut Down and Depressurized CNP 1997
- Detailed Assessment of Safety Systems and Fundamental Programs
- De-fueled July-August 1999
 - Focus workforce on restart work
 - Safety given priority over production
 - Allowed comprehensive actions to improve safetysystem performance
- Overhauled Plant Processes Critical to Safety

- CAP

Design Control

Slide 2 - 50.59

- ECP



Implementation of Oversight Program - Bases for Proposal

- Cook Focused on Safe Return of Units
- Recognition of Some Deferral for Program Implementation
- **Evaluated Implementation Challenges**



Historical Data

Reactor Safety - Unplanned Scrams Reactor Safety - Scrams with Loss of	В	В	
			В
Normal Heat Removal	B	В	В
Reactor Safety - Unplanned Power Changes	В	В	В
Emergency Power - 2 EDGs (per Unit)	B	В	В
Pressurized Water Reactor - High Pressure Injection System (HPSI)	В	В	В
Pressurized Water Reactor - Heat Removal System (AFW)	R	В	В
Residual Heat Removal System (RHR)	8	В	В
Safety System Functional Failures	В	В	В
RCS Activity	В	В	В
RCS Leakage	В	В	В
Containment Leakage	В	В	8
Emergency Preparedness - Drill/Exercise Performance	C	E	G
Emergency Preparedness - ERO Drill Participation	G	G	G
Emergency Preparedness - Alert and Notification System	G	G	G
Occupational Radiation Safety - Occupational Exposure Control Eff.	Υ	R	Y
Public Radiation Indicator -	G	G	G
Physical Protection - Protected Area	Y	G	G
Physical Protection - Personnel	G	G	G
Physical Protection - FFD/Personnel	G	G	G
	Reactor Safety - Unplanned Power Changes Emergency Power - 2 EDGs (per Unit) Pressurized Water Reactor - High Pressure Injection System (HPSI) Pressurized Water Reactor - Heat Removal System (AFW) Residual Heat Removal System (RHR) Safety System Functional Failures RCS Activity RCS Leakage Containment Leakage Emergency Preparedness - Drill/Exercise Performance Emergency Preparedness - ERO Drill Participation Emergency Preparedness - Alert and Notification System Occupational Radiation Safety - Occupational Exposure Control Eff. Public Radiation Indicator - RETS/ODCM Radiological Effluents Physical Protection - Protected Area Equipment Physical Protection - Personnel Screening Program	Reactor Safety - Unplanned Power Changes Emergency Power - 2 EDGs (per Unit) Pressurized Water Reactor - High Pressurized Water Reactor - Heat Removal System (AFW) Residual Heat Removal System (RHR) Safety System Functional Failures RCS Activity RCS Leakage Containment Leakage Emergency Preparedness - Drill/Exercise Performance Emergency Preparedness - Aert and Notification System Occupational Radiation Safety - Occupational Exposure Control Eff. Public Radiation Indicator - RETS/ODCM Radiological Effluents Physical Protection - Personnel Screening Program Physical Protection - FFD/Personnel G	Reactor Safety - Unplanned Power Changes Emergency Power - 2 EDGs (per Unit) Pressurized Water Reactor - High Pressurized Injection System (HPSI) Pressurized Water Reactor - Heat Removal System (AFW) Residual Heat Removal System (RHR) Safety System Functional Failures B B RCS Activity B B RCS Leakage Containment Leakage Emergency Preparedness - Drill/Exercise Performance Emergency Preparedness - ERO Drill Participation Emergency Preparedness - Alert and Notification System Occupational Radiation Safety - Occupational Exposure Control Eff. Public Radiation Indicator - RETS/ODCM Radiological Effluents Physical Protection - Personnel Screening Program Physical Protection - FFD/Personnel G B B B B B C B B C B C C C

Collection
Barriers

R High

Y Medium

G Low

B N/A



Historical Data - Observations

- Operational Data Not Available
- Emergency Preparedness Data Appears to be Available
- Occupational Radiation data was kept in our old CAP - Unreliable and Difficult to Extract
- Public Radiation Safety and Safeguards Data Appears to be Available

Historical Data at this time not meaningful



Implementation Considerations

- Establishing Data Collection/Validation Organization and Processes (e.g., 50.9)
- **■** Procedure Development
- **SDP Development**
- Safety Distraction
 - PRA Modeling
 - Leadership focus for implementation



Proposed Implementation Plan & Schedule





