

March 16, 2000

Mr. David A. Lochbaum
Union of Concerned Scientists
1616 P Street NW, Suite 310
Washington, DC 20036

SUBJECT: LETTER REGARDING OVERSIGHT PROCESS FOR D. C. COOK DATED
FEBRUARY 16, 2000

Dear Mr. Lochbaum:

This letter is in response to your letter dated February 16, 2000, regarding the transition of the D. C. Cook plant to the Revised Reactor Oversight Process (RROP) including the Risk Informed Baseline Inspection Program (RIBIP). We appreciate your interest and recommendations for transition of the D. C. Cook plant to the RROP. While your letter indicated that no response was necessary, we felt that a response would help you understand the rationale used by the NRC in developing a plan to implement the RIBIP at the D. C. Cook plant. Your letter shows that you have taken time to study the revised inspection process and your recommendations have been considered by the NRC staff.

You stated in your letter that implementation of the RIBIP in its entirety immediately upon the restart of D. C. Cook Unit 2 is the desired approach. We agree with this and, with Commission approval to implement the RROP, we intend to implement the RIBIP following the restart of D. C. Cook Unit 2. However, D. C. Cook will not have data available for many of the Performance Indicators (PIs) at the time of Unit 2 restart. As a result, the NRC will augment the baseline inspection program in those areas where insight into licensee performance is not available due to the lack of PI data. In addition, we will utilize the RROP assessment tools to evaluate the significance of inspection findings. On March 10, 2000, we met with D. C. Cook management and staff to discuss this approach with them.

The approach outlined above compensates for the lack of PI data and does not require that PIs be artificially established as Green on restart. You state in your letter that the licensee's Restart Action Plan and the NRC's 0350 process will provide assurance that D. C. Cook Unit 2 can be safely operated upon restart authorization. You further suggest that all of the assessments, evaluations, tests, reviews and inspections completed through these processes result in performance in each performance indicator category being restored to the Green band. While we agree that the licensee's Restart Action Plan and the NRC's 0350 process will provide assurance that D. C. Cook Unit 2 can be safely operated upon restart authorization, we do not completely agree that this demonstrates performance in the Green band. Over the past two and one half years, D. C. Cook was focused on programmatic improvements, which if properly implemented, will improve the overall performance of the facility. However, although significant licensee and NRC resources have been expended over this time frame evaluating the programmatic improvements, very little insight has been gained on actual operational performance, primarily due to the plant's shutdown status. Therefore, before a more objective assessment of licensee performance can be made, implementation of the RIBIP at Unit 2 restart with augmented inspection effort, will provide sufficient insight until PI data is valid.

D. Lochbaum

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Again, we appreciate your interest and comments on this process. If you have any questions or would like to discuss this subject further, please do not hesitate to contact me at (630) 829-9700.

Sincerely,

/RA/

John A. Grobe, Director
Division of Reactor Safety

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

D. Lochbaum

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Again, we appreciate your interest and comments on this process. If you have any questions or would like to discuss this subject further, please do not hesitate to contact me at (630) 829-9700.

Sincerely,

/RA/

John A. Grobe, Director
Division of Reactor Safety

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