

November 29, 2000

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

SUBJECT: MID-CYCLE PERFORMANCE REVIEW AND INSPECTION PLAN - D.C. COOK

Dear Mr. Powers:

On November 7, 2000, the NRC staff completed its Mid-Cycle plant performance assessment of D.C. Cook. The Mid-Cycle Review for D.C. Cook involved all technical divisions in evaluating performance indicators and inspection results for the period of April 2, 2000, through September 30, 2000. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility so that you will have an opportunity to prepare for these inspections and to inform us of any planned inspections which may conflict with your plant activities.

Plant performance for the most recent quarter was within the Licensee Response Column of the NRC's Action Matrix based on inspection findings being classified as having very low safety significance (Green) and available performance indicators indicating performance at a level requiring no additional NRC oversight (Green). In the Reactor Safety Strategic Performance Area, the NRC staff determined that overall plant operations at D.C. Cook have been conducted safely and in accordance with regulatory requirements and license commitments. Operators performed refueling and startup evolutions of Unit 2 in a controlled and safe manner. Overall maintenance was conducted safely and effectively, including ice condenser refurbishment on both units. However, a weakness was identified with aspects of maintenance rule implementation at your facility.

In engineering, based on our review of calculations and design changes early this assessment period, we determined that design control process improvements that you initiated during the extended outage have been effective. However, we noted some examples of weak engineering practices during the assessment period indicating that consistent engineering performance has yet to be demonstrated. Examples include the failure to fully evaluate limiting conditions for the essential service water system, failures to account for instrument and analytical uncertainties, and the failure to recognize the need to perform increased frequency testing for components per the Inservice Test Program. Performance in the Radiation Safety and Safeguards Strategic Performance Areas was determined to be satisfactory.

The NRC Inspection Manual Chapter 0350 Oversight Panel concluded that inspections beyond the baseline inspection program will be necessary through the restart of Unit 1, due to lack of PI data providing insight into Unit 2 operations and to provide necessary assessment of Unit 1 readiness for restart and the adequacy of long term corrective actions. The panel will routinely assess plant performance and operating experience, evaluate the continuing need for augmented inspection and recommend when NRC oversight can return to the routine inspection program.

In developing the inspection plan for D.C. Cook, the NRC staff considered the availability of performance indicators in each of the strategic performance areas. In addition, the NRC staff considered the additional inspections that may be warranted to adequately assess the restart readiness of Unit 1, and evaluate the adequacy of long term corrective actions initiated during the extended outage. Consequently, in the Reactor Safety strategic performance area, we intend to continue with an expanded level of oversight by sampling more activities in the Initiating Events, Mitigating Systems, Barrier Integrity and Emergency Preparedness cornerstones. Examples of baseline inspections that will be augmented include emergent work, equipment alignment, maintenance rule, non-routine evolutions, operability evaluations, operator workarounds, surveillance testing, post maintenance testing and refueling outage activities. Inspections in the Radiation Safety strategic performance area will not be augmented since the performance indicators are considered valid. In the Safeguards Strategic Performance Area, an Operational Safeguards Readiness Evaluation (OSRE) inspection has been planned in place of a portion of the baseline inspection program under the Physical Protection Cornerstone.

The enclosure details the scheduled inspections that will occur through September 30, 2001. The inspection plan is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The last 6 months of the inspection plans are tentative and will be revised at the end-of-cycle review meeting.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) a component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Anton Vegel at (630) 829-9620 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Geoffrey E. Grant, Director
Division of Reactor Projects

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

Enclosure: Inspection/Activity Plan

cc w/encl: A. C. Bakken III, Site Vice President
J. Pollock, Plant Manager
M. Rencheck, Vice President, Nuclear Engineering
R. Whale, Michigan Public Service Commission
Michigan Department of Environmental Quality
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Cook
Inspection / Activity Plan
12/01/2000 - 09/30/2001

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
	U1 RRATI - UNIT 1 RESTART READINESS ASSESSMENT		5			
1	IP 93802	Operational Safety Team Inspection		11/27/2000	12/01/2000	Regional Team
	81110 - SAFEGUARDS INSPECTION-OSRE (TWO PARTS)		5			
1, 2	IP 81110	Operational Safeguards Response Evaluation (OSRE)		12/07/2000	01/12/2001	Baseline Inspections
	IP 71121 - RAD INSTR & POST-STARUP RP		1			
1, 2	IP 7112103	Radiation Monitoring Instrumentation		12/18/2000	12/22/2000	Baseline Inspections
	71152 - PROBLEM ID AND RESOL (RI)		4			
1, 2	IP 71152	Identification and Resolution of Problems		01/22/2001	02/02/2001	Baseline Inspections
	IP 71121 - ALARA CONTROLS AND PI VERIFICATION		1			
1, 2	IP 7112102	ALARA Planning and Controls		02/12/2001	02/16/2001	Baseline Inspections
1, 2	IP 71151	Performance Indicator Verification		02/12/2001	02/16/2001	Baseline Inspections
	HEAT SNK - BIENNIAL HEAT SINK		1			
1, 2	IP 7111107B	Heat Sink Performance		02/19/2001	02/23/2001	Baseline Inspections
	M/R - BIENNIAL MAINTENANCE RULE		1			
1, 2	IP 7111112B	Maintenance Rule Implementation		03/26/2001	03/30/2001	Baseline Inspections
	FY 2001 - COOK INIT PREP 04/2001		4			
1	W90027	OL - INITIAL EXAM - D.C. COOK (UNITS 1&2)		04/16/2001	04/20/2001	Not Applicable
	FY 2001 - COOK INIT EXAM 04&05/2001		4			
1	W90027	OL - INITIAL EXAM - D.C. COOK (UNITS 1&2)		05/07/2001	05/25/2001	Not Applicable
	RI INSP - HOT ADVERSE WEATHER (RI)		1			
1, 2	IP 7111101	Adverse Weather Protection		05/13/2001	06/30/2001	Baseline Inspections
	IP 71122 - LIQ/GAS EFFLUENTS INSP		2			
1, 2	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		05/29/2001	06/01/2001	Baseline Inspections
1, 2	IP 7112202	Radioactive Material Processing and Transportation		05/29/2001	06/01/2001	Baseline Inspections
	IP 71114 - BIENNIAL EMERG PREP EXER INSP		3			
1, 2	IP 7111401	Exercise Evaluation		07/09/2001	07/13/2001	Baseline Inspections
1, 2	IP 71151	Performance Indicator Verification		07/09/2001	07/13/2001	Baseline Inspections
	FY 2001 - COOK INIT PREP 07/2001		2			
1	W90039	OL - INITIAL EXAM - D.C. COOK (UNITS 1&2) (AUG. 2001)		07/23/2001	07/27/2001	Not Applicable
	FY 2001 - COOK INIT EXAM 08/2001		3			
1	W90039	OL - INITIAL EXAM - D.C. COOK (UNITS 1&2) (AUG. 2001)		08/13/2001	08/24/2001	Not Applicable

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.