

August 21, 2003

Mr. Robert P. Powers
Executive Vice President and
Chief Nuclear Officer
Nuclear Generation Group
American Electric Power Company
500 Circle Drive
Buchanan, MI 49107

SUBJECT: DONALD C. COOK NUCLEAR POWER PLANT, UNITS 1 AND 2
NRC INSPECTION REPORT 50-315/03-11(DRS); 50-316/03-11(DRS)

Dear Mr. Powers:

On July 25, 2003, the NRC completed an inspection at your Donald C. Cook Nuclear Power Plant, Units 1 and 2. The enclosed report documents the inspection findings, which were discussed on July 25, 2003, with Mr. M. Finissi and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, this inspection focused on emergency preparedness, including your staff's determinations of performance indicators for the Emergency Preparedness Cornerstone.

On the basis of the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR Part 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) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Kenneth Riemer, Chief
Plant Support Branch
Division of Reactor Safety

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

Enclosure: Inspection Report 50-315/03-11(DRS);
50-316/03-11(DRS)

See Attached Distribution

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NRC INSPECTION REPORT 50-315/03-11(DRS); 50-316/03-11(DRS)

Dear Mr. Powers:

On July 25, 2003, the NRC completed an inspection at your D. C. Cook Nuclear Power Plant, Units 1 and 2. The enclosed report documents the inspection findings, which were discussed on July 25, 2003, with Mr. M. Finissi and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, this inspection focused on emergency preparedness, including your staff's determinations of performance indicators for the Emergency Preparedness Cornerstone.

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R. Powers

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cc w/encl: Site Vice President
M. Finissi, Plant Manager
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

A. Bakken

-2-

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-315, 50-316

License Nos: DPR-58; DPR-74

Report No: 50-315/03-11(DRS); 50-316/03-11(DRS)

Licensee: Indiana Michigan Power Company

Facility: D. C. Cook Nuclear Power Plant, Units 1 and 2

Location: 1 Cook Place
Bridgman, MI 49106

Dates: July 21 through July 25, 2003

Inspectors: T. Ploski, Senior Emergency Preparedness Inspector
R. Jickling, Emergency Preparedness Inspector
B. Kemker, Senior Resident Inspector

Approved by: Kenneth Riemer, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000315/2003-011(DRS); 05000316/2003-011(DRS); Indiana Michigan Power Company; 07/21/03-07/25/03; D. C. Cook Nuclear Power Plant; Emergency Preparedness Specialist Report.

The report covers a one-week baseline inspection by two regional emergency preparedness inspectors and a resident inspector. The inspection focused on the Emergency Preparedness Cornerstone in the Reactor Safety strategic performance area during the biennial emergency preparedness exercise. This inspection also included a review of records related to the three emergency preparedness performance indicators for the nine-month period ending June 30, 2003. No findings of significance were identified.

The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector-Identified and Self-Revealed Findings

None.

B. Licensee-Identified Violations

None.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

a. Inspection Scope

The inspectors reviewed the July 22, 2003 biennial emergency preparedness exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's emergency plan and to verify that the exercise's simulated problems provided an acceptable framework to support demonstration of the licensee's capability to implement its plan. The inspectors also reviewed records of two drills, which were conducted in mid-June and early July 2003, to determine whether the associated accident scenarios were sufficiently different from the scenario used in the July 22, 2003 exercise.

The inspectors evaluated the licensee's exercise performance, focusing on the risk-significant activities of emergency classification, notification, and protective action decision making, as well as implementation of accident mitigation strategies in the following emergency response facilities:

- Control Room Simulator (CRS);
- Technical Support Center (TSC);
- Operations Support Center (OSC); and
- Emergency Operations Facility (EOF).

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interfaces with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the TSC, OSC, and EOF to evaluate the licensee's initial self-assessment of its exercise performance. The inspectors later met with the licensee's lead exercise evaluators to obtain the licensee's refined assessments of its exercise participants' performances. These self-assessments were then compared with the inspectors' independent observations and assessments to assess the licensee's ability to adequately critique station performance during the exercise.

b. Findings

No findings of significance were identified.

4. **OTHER ACTIVITIES**

4OA1 Performance Indicator (PI) Verification (71151)

a. Inspection Scope

The inspectors reviewed the licensee's records related to each of the three emergency preparedness PIs to verify that the licensee's program was implemented consistent with the industry guidelines in Nuclear Energy Institute publication No. 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2, and related licensee procedures. Specifically, licensee records related to the performance of the Alert and Notification System (ANS), key Emergency Response Organization (ERO) members' drill participation, and Drill and Exercise Performance (DEP) were reviewed to verify the accuracy and completeness of the data submitted to NRC for the period from October 2002 through June 2003.

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems

The following scenario and performance concerns were identified by the licensee in the critique of the July 2003 exercise that could have adversely impacted response activities if scenario events had been real:

- Due to coordination problems, the initial attempt to assemble and account for all onsite personnel was unsuccessful.
- Although the licensee's press releases provided the reason for the Alert declaration, none of the licensee's press releases described the reasons for the subsequent Site Area Emergency and General Emergency declarations, as well as indicating that a simulated offsite radiological release was associated with the latter declaration.

4OA6 Meetings

Exit Meeting

The inspectors presented the inspection results to Mr. M. Finissi and other members of licensee management and staff at the conclusion of the inspection on July 25, 2003. The licensee acknowledged the information presented. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

V. Butler, Systems Engineer
H. Etheridge, Senior Regulatory Affairs Specialist
M. Finissi, Plant Manager
G. Gibson, Site Protection Manager
J. Giessner, Plant Engineering Assistant Director
C. Graffenius, Emergency Planning Coordinator
R. Meister, Senior Regulatory Affairs Specialist
S. Partin, Emergency Preparedness Manager
M. Scarpello, Regulatory Compliance Supervisor
S. Simpson, Assistant Operations Director
L. Weber, Performance Assurance Manager
D. Wood, Radiation Protection Manager

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1EP1 Exercise Evaluation

D. C. Cook Nuclear Power Plant Exercise Scenario Manual; July 2003

Drill Scenario Time Line and Narrative Summary; June 17, 2003

Drill Scenario Time Line and Narrative Summary; July 8, 2003

PMP-2080-EPP-100; Emergency Response; Revision 1

PMP-2080-EPP-101; Emergency Classification; Revision 3b

PMP-2080-EPP-107; Notification; Revision 17

PMP-2080-EPP-108; Initial Dose Assessment; Revision 4

RMT-2080-TSC-001; Activation and Operation of the TSC; Revision 2

RMT-2080-OSC-001; Activation and Operation of the OSC; Revision 2

RMT-2080-EOF-001; Activation and Operation of the EOF; Revision 2

D. C. Cook Nuclear Plant Emergency Plan, Section J; Protective Response; Revision 18

Preliminary Assessment of the Cook Plant's 2003 NRC-Graded Exercise Conducted on July 22, 2003; dated July 24, 2003

CR 03203055; During the July 22 Exercise Performance Deficiencies in CRS on Use of Emergency Operating Procedures and Emergency Plan Implementing Procedures

CR 0304049; During the July 22 Exercise CRS Staff Did not Terminate Communications With County Officials After EOF Staff Established Communications With These Officials

CR 03204052; During the July 22 Exercise the Simulated Dismissal of Non-Essential Personnel from the Protected Area was Premature

CR 03204053; During the July 22 Exercise Coordination Problems Resulted in the Initial Attempt to Account for Personnel Within the Protected Area to be Unsuccessful

CR 03204055; During the July 22 Exercise TSC Staff Made Unnecessarily Decisions to Simulate Invoking 10 CFR 50.54(x) and 10 CFR 50.54(y)

CR 032004056; During the July 22 Exercise a Non-participant Attempted to Re-boot the Computer Controlling the CRS

CR 03204057; During the July 22 Exercise Potassium Iodide Consent Forms Were Not Filled Out by Offsite Survey Team Members

CR 03204058; During the July 22 Exercise Only One of Two Emergency Action Levels Used as the Bases of the Site Area Emergency Was Relevant to Degraded Conditions

CR 03204060; Communications Concerns During the July 22 Exercise

CR 03205009; The Plant's Assembly Siren was not Sounded in Accordance with Procedural Criteria During the July 22 Exercise

40A1 Performance Indicator Verification

Desk-top Guide for Emergency Planning Performance Indicators; Revision 3

PMP 7110.PIP.001; Regulatory Oversight Program Performance Indicators, Drill and Exercise Performance; December 2002 Through June 2003

Monthly and Quarterly Records of Opportunities for the ANS, ERO, and DEP Performance Indicators; October 2002 Through June 2003

CR 02340005; Document Errors Reported in Second and Third Quarter 2002 DEP Indicator Data

CR 03205106; DEP and ERO data for First and Second Quarters of 2003 Need to be Revised to Remove Six PI Opportunities

CR 03045015; Emergency Response Data System was Inappropriately Activated During a February 2003 Drill

AR 02018050; Inaccurate Data Supplied for ERO and DEP Indicators for Fourth Quarter 2001

AR 03064028; Error on State/County Notification Form for Actual Unusual Event on January 15, 2003

AR 03118028; During Actual Alert Event in April 2003, There Was About a 22 Minute Delay in Activating the ERO's Pagers

AR 03119078; During Actual Alert Event in April 2003, There Were Problems in Documenting Some Damage Control Teams' Activities

Scenarios 2,3,4,7, and 9 Used for Event Classification in March 2003 and June 2003 Drills

LIST OF ACRONYMS USED

ANS	Alert and Notification System
CRS	Control Room Simulator
DEP	Drill and Exercise Performance
EOF	Emergency Operations Facility
ERO	Emergency Response Organization
NUREG	Nuclear Regulatory Guide
OSC	Operations Support Center
PI	Performance Indicator
TSC	Technical Support Center
USNRC	United States Nuclear Regulatory Commission