

INDIANA & MICHIGAN ELECTRIC COMPANY

P. O. BOX 18
BOWLING GREEN STATION
NEW YORK, N. Y. 10004

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74

May 28, 1980
AEP:NRC:00414

Mr. J. G. Keppler, Regional Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

This letter provides the required response to the Notice of Violation attached to Mr. R. F. Heishman's letter of May 5, 1980. Mr. Heishman's letter, which also transmitted IE Report No. 50-315/80-01; 50-316/80-01 to us, was received in our New York Office on May 8, 1980. .

Item No. 1 - Deficiency

1. 10 CFR 50 Appendix B, Criterion II states that the applicant shall identify the structures, systems, and components to be covered by the quality assurance program.

FSAR Section 1.7.19.2 states that an "N" list of Class I components has been developed and is maintained by AEPSC.

Contrary to the above, the inspector found that the "N" list had not been maintained as required. The "N" list currently in use is in draft form and had not been approved.

Item No. 1 - Corrective Actions

The "N" list of Class I components for the Donald C. Cook Nuclear Plant Units 1 and 2 is presently being revised and placed on a computerized file. This list will be continually updated in accordance with AEPSC QA Procedure N List (QAP-131), as additional Class I components are identified. The N list shall be published at appropriate intervals not to exceed one year. Full compliance for this deficiency will be achieved by July 31, 1980. Interim N List published in January, 1980 will serve as the list until full compliance is achieved.

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Item No. 2 - Infraction

10 CFR 50, Appendix B, Criterion V states that activities effecting quality shall be prescribed by documented instructions and procedures and shall be accomplished in accordance with these instructions and procedures.

PMI 7020 requires that if corrective action is required as part of an audit report, action shall be taken within 30 days.

Contrary to the above, corrective action for audit reports QA 78-12, 78-19 and 78-21 was not taken in the required 30 day period.

Item No. 2 - Corrective Actions

The Plant Manager issued a memorandum directing all plant departments to fully comply with the requirements of PMI-7020 relative to audit response times. In addition, at the request of the Plant Manager, the Plant Quality Assurance Department has compiled a list of all 'open' audits. This list has been distributed to all plant departments. By May 28, 1980 each department must supply a close-out date for every audit under their cognizance.

Item No. 3- Infraction

10 CFR 50, Appendix B, Criterion XVIII states that a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program.

Contrary to the above, the inspector found that a comprehensive system of audits for safety related activities at the corporate office had not been addressed in the AEPSC Quality Assurance Program and that formal audits of corporate office activities had not been implemented.

Item No. 3 - Corrective Actions

A comprehensive system of planned and periodic audits for safety related activities at AEPSC has been addressed in QA Procedure QA Audits (QAP-191). This system of planned and periodic audits has been implemented at AEPSC. Full compliance for this infraction was achieved by April 1, 1980.

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Item No. 4 - Deficiency

10 CRF 50, Appendix B, Criterion II established the requirement for adequate cleanliness control over activities affecting the quality of identified structures, systems and components.

PMI 2090 requires periodic cleanliness inspections of the plant.

Contrary to the above, the In-Plant General Safety Committee had not conducted quarterly cleanliness inspections as required.

Item No. 4 - Corrective Actions

One of the original requirements of PMI-2250, Rev. 3 establishes that periodic in-plant cleanliness inspections would be conducted. It should be noted that PMI-2090 and PMI-2290, as well as QHI-2090 adequately cover housekeeping and plant cleanliness responsibilities. Nonetheless, PMI-2250 was not revised to remove that commitment until 1-21-80 when a total and complete reorganization of the In-Plant Safety Committee was made under Revision 4.

PMI-2250, Rev. 4, effective 1-21-80, stipulates permanent type committee assignments rather than rotating assignments, better identifies and controls the handling of accident investigations and off-site medical treatment. The current revision of PMI-2250 and subsequent documented meeting minutes now place us in full compliance.

Item No. 5 - Deficiency

10 CRF 50, Appendix B, Criterion XI requires that a test program shall be established to assure that all testing requirements to demonstrate that structures, systems and components will perform satisfactorily.

PMI 4030 requires that when changes to the Technical Specifications are made, the master surveillance test shall be reviewed and revised as necessary.

Contrary to the above, the inspector found that an up-to-date master surveillance schedule was not being maintained.

Item No. 5 - Corrective Actions

All Plant Departments were requested to review QHI-4030 entitled, "Surveillance Testing" and to submit any changes to the Plant Quality Assurance Department for incorporation into the PMI. On May 21, 1980 a revision of PMI-4030 was made utilizing the Plant's temporary change sheet procedure.

The Plant's Master Surveillance Schedule now reflects all recent changes made to the Technical Specifications. To preclude this from happening again, the following action was taken or is being planned:

- A) A requirement was added to the PMI that makes the plant manager or his designated alternate responsible for insuring that any time a Technical Specification change is issued, that the change is reviewed to determine if the surveillance criteria established in PMI-4030 are correct and, if they are not correct, that a temporary change sheet be initiated.
- B) The AEP Service Corporation is in the process of reviewing the Plant's surveillance test requirements to determine the feasibility of computerizing this program. This study is tentatively scheduled to be completed by June 15, 1980.

Item No. 6 - Infraction

10 CFR 50, Appendix B, Criterion XIV requires that procedures shall be provided for control of equipment, as necessary, to maintain personnel and reactor safety and to avoid unauthorized operation of equipment.

PMI 2140 requires that lifted leads shall be tagged to identify them for determination.

Contrary to the above, the inspector found that leads of the instrument and control cables for the hot shutdown panel were not being controlled as required.

Item No. 6 - Corrective Actions

Based on the NRC inspector's findings and our own internal findings, the following actions were taken:

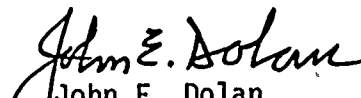
- a) A review of PMI-2140 was performed to determine its adequacy. Based on this review it was felt that the procedure for cable tagging for new cables and for those lifted or jumpered following termination is adequate.
- b) The Construction Manager, during February 1980, conducted many meetings with the electrical contractor reiterating the requirements of PMI-2140. In addition, many written reminders of the importance of PMI-2140 were also issued during this time period.

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- c) The Plant Quality Assurance Department has instituted a surveillance program requiring that this inspection be performed on a daily basis; Monday through Friday. The Plant QA Department has also instituted random inspections of Design Changes and special tests in progress to insure compliance with the controls established by PMI-2140, during periods of increased construction activities.
- d) To supplement the Plant inspections, the Construction organization has instructed their electrical engineer to perform weekly inspections to determine compliance with PMI-2140.

Based on recent inspection reports performed by the Plant QA Department, the actions taken seem adequate to assure compliance with the controls established within the subject PMI.

Very truly yours,


John E. Dolan
Vice President

JED:dfs

cc: R. C. Callen
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