INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

November 28, 1984
AEP:NRC:0911

Donald C. Cook Nuclear Plant
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC REPORT NOS. 50-315/84-16(DRS); 50-316/84-18(DRS)

Mr. James G. Keppler
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter responds to Mr. R. D. Walker's letter dated October 26, 1984 which forwarded the subject Inspection Report of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant and AEPSC Corporate offices in Columbus, Ohio during the period August 7, 1984 through October 18, 1984. Per discussion with Mr. F. Hawkins of your staff on November 26, 1984 an extension to December 3, 1984 was granted for the response to this inspection report. The Notice of Violation attached to Mr. Walker's letter identified two items of noncompliance, one of which (Item 2) requires no response. The following is our response to Item 1:

ITEM OF NONCOMPLIANCE - 1

"10 CFR 50, Appendix B Criterion XVI, as implemented by the Donald C. Cook Operations Quality Assurance (QA) Program, requires that measures be established to ensure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, the following examples of untimely or ineffective corrective action were noted.

a. The commitment date of February 1984 for full compliance in establishing and implementing a Quality Control (QC) inspector qualification program for the D. C. Cook plant was not met.

b. Responses to Corrective Action Requests (CARs) were consistently late. The report of overdue CARs issued August 9, 1984 listed 61 overdue CAR responses.

c. A Corrective Action Request was not issued on the failure to perform required limit switch testing during the 1983 Unit 1 refueling outage. This problem was noted by the American Electric Power Service Corporation (AEPSC) auditor in audit QA-84-06 but the auditor did not submit the item as a finding for required corrective action."

RESPONSE TO THE ITEM OF NONCOMPLIANCE

a. Within this report it is stated that this item had been identified previously by the Resident Inspector in August, 1983 (315/83-12-03; 316/83-13-02). In reviewing this report, it appears that the noncompliance was initiated due to the following:

"Inspection activities during this period resulted in finding that personnel assigned responsibility for performing ice condenser basket weight surveillance testing were not certified to be qualified to perform this task. Further review determined that the commitments to certify personnel according to the requirements of ANSI N45.2.6 had never been implemented for plant personnel who perform surveillance testing, inservice tests and inspection. Interestingly, contractor quality assurance programs were responsive to the plant's commitments in this area. There was no evidence that the failure to certify these personnel resulted in questionable performance of tests and inspections. 10 CFR 50 Appendix B Criterion II requires that quality assurance program be documented by written instructions, procedures or policy. This aspect of the program does not comply with this requirement and constitutes an item of noncompliance as documented in the Appendix (315/83-12-03 (DPRP); 316/83-13-02 (DPRP))."

This was further expanded on in the item of noncompliance referenced in the above IE Report 315/83-12; 316/83-13 in which the following was stated:

"10 CFR 50, Appendix B, Criterion II states in part. . ." This [Quality Assurance] program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life in accordance with those policies, procedures or instructions. . . The program shall take into account the need for special controls, processes, test equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection and test.

Donald C. Cook Units No. 1 and 2 FSAR Section 1.7.19.2 describes the quality assurance program and commits to comply with the requirements of Regulatory Guide 1.58 and ANSI Standard N45.2.6-1973. Commitments and exceptions to the revisions of the requirements concerning Qualifications of Inspections, Examination, and Testing Personnel were revised by letter dated September 14, 1981 (AEP:NRC:00567).

Contrary to the above, requirements the licensee committed to in the 1973 and 1978 version of ANSI N45.2.6 were not implemented by written policies, procedures, or instructions. These include:

a. Certification of personnel qualification
b. Documented determination of activities individuals are certified to perform
c. Initial and periodic evaluations of job performance

d. Specification of required physical characteristics.
e. Maintaining records of the above"

This citation was not directed specifically at QC inspectors as the QC Department was formed in July, 1983, and the QC Section of inspection type personnel did not become a reality until February, 1984.

Corrective Action Taken and Results Achieved

In our response of September 6, 1983, to Inspection Report 83-12; 83-13 (AEP:NRC:0847), we stated the following:

"In order to make our program more responsive several of our Plant Manager Instructions will require revision. Our current plans are to have the applicable instructions revised and implemented by the end of February 1984."

With the advent of the Regulatory Performance Improvement Program and the changes brought about by this program, the magnitude of this effort increased substantially. The Plant and AEPSC have been working jointly on a Corporate Level procedure that will encompass both the Corporate Office and the Plant relative to those personnel who require certification. This procedure should be issued no later than March 30, 1985.

Since February, 1984, QC personnel have been performing one of two tasks; either monitoring work in progress which would insure that an inspection is performed by personnel as defined within our FSAR, or are performing the inspection themselves. When a QC Technician is assigned to perform an inspection, this individual receives appropriate training which is documented. This documented training is consistent with our response to NRC Generic Letter 81-01 (AEP:NRC:00567, 9/14/81) as accepted by NRC (Varga to Dolan, 4/9/82). In addition, the Plant Quality Control Department has prepared two instructions/procedures that define the training and certification process required to meet the intent of ANSI N45.2.6-1978. The instruction was issued on November 13, 1984. The procedure that will implement this instruction is in the draft stage and is scheduled for approval by December 31, 1984. This procedure will complement the Corporate Procedure prepared for the certification process.

Corrective Action to be Taken to Avoid Further Noncompliance

One of the activities assigned to the Quality Control Department is that of tracking commitments to the Nuclear Regulatory Commission. Plant commitments generated as a result of NRC Inspection Reports are now placed on the QC Superintendent's weekly Letter to the Plant Manager and applicable Department Heads. This listing provides the Plant Manager with the following information: Description of the Response or Commitment, Department Assignment, and Due Date of Commitment. In

addition, one individual in the Quality Control Department's Administrative Compliance Section has been designated to follow NRC commitments. This individual will contact and advise personnel of approaching due dates and will take the necessary action to advise management of any dates in jeopardy so that appropriate action can be taken.

Date When Full Compliance Will Be Achieved

Partial compliance with this item will be achieved with the issuance of the procedures for Corporate and Plant certification and Plant Quality Control certification scheduled for March 30, 1985 and December 31, 1984 respectively. However, full compliance will require varying degrees of additional training for personnel affected by these procedures, before they can be deemed fully certified. It is expected that the required training and certification activities for the current QC staff will be completed by December 31, 1986. The program defined by the corporate procedure for other personnel will be implemented on March 30, 1985. Full compliance for all other personnel requiring certification will be achieved upon satisfactory completion of the training defined within the approved accredited INPO training program.

b. The cause for this noncompliance was a misunderstanding on the part of the plant staff as to what actions were required in order to respond to a Quality Assurance Audit Corrective Action Request (CAR). This misunderstanding came about due to the lack of clarity of the instructions for responding to audit CARs as contained in both plant and corporate procedures.

Correction Action Taken and Results Achieved

Prior to this inspection, a list of overdue responses to QA audit CARs had been sent to senior corporate management for resolution.

As a result of this escalation, several discussions were held with the Cook Plant Manager to clarify the situation and to establish a schedule for submitting the required responses.

Responses to the overdue QA audit CARs were received from the Cook Plant Manager on September 5, 1984.

Corrective Action To Be Taken To Avoid Further Noncompliance

Both the plant and corporate procedures governing QA audits have been revised to clarify the instructions pertaining to how to respond to QA audit CARs.

In addition, the manner in which QA audits are made final has been revised at the request of the Cook Plant Manager. Tentative corrective actions and assignments for taking such actions will be resolved at the formal audit exit meeting, thereby eliminating the delay previously inserted by waiting for action assignments subsequent to the Plant Manager's review of the audit report.

The Cook Plant Manager has made a commitment to keeping plant responses to QA Audit CARs current so as to be in compliance with the established requirements.

Data When Full Compliance Will Be Achieved

Full compliance was achieved on September 5, 1984.

c. QA Audit 84-04, Item 06, "recommended" that certain Cook Plant Maintenance Department refueling procedures and the 1983 Unit One Westinghouse refueling procedure be reviewed and revised, as necessary, to cross reference all applicable plant and vendor procedures which accomplish the same objectives. This recommendation was made after an auditor noted that neither weekly limit switch testing nor testing on a shift basis of the refueling crane paddle limit switches as required by Plant Maintenance procedures, had been conducted during the 1983 Unit One refueling by Westinghouse.

QA audit procedures define the terms "recommendation" and "deviation". In light of a strict literal interpretation of these definitions, Item 06 should have been classified as a "deviation" and a corrective action request issued.

It must be pointed out that even if audit item 06 had been classified as a "deviation", corrective actions beyond those described below would not have been applicable since the audit was conducted after the refueling outage was over and during a time period in which backfitting the test was not possible or meaningful.

Corrective Action Taken and Results Achieved

The QA auditor, being aware of the problem, assured (through his personal review) that subsequent revision of the Westinghouse refueling procedure more clearly reflected and defined the requirements for the refueling crane limit switch test. In addition, he required that the procedure be modified to require signatures verifying completion of these tests.

Corrective Action To Be Taken To Avoid Further Noncompliance

Since adequate program controls were in place (QA audit procedures) which should have assured the correct classification of audit item 06, the noncompliance is attributed to an oversight with respect to these controls.

The AEPSC Site QA Supervisor, who is responsible for the final review and approval of site originated audit reports, was well aware of the program requirements, further indicating an isolated case of oversight on the part of QA personnel. Several discussions between the responsible QA personnel have been held concerning the cited non-compliance. In addition, QA Audit Report 84-04 and NRC Report 50-315/84-16; 50-316/84-18 have been routed for required reading by all AEPSC site QA auditors. It is our opinion that these preventive actions are adequate to preclude future occurrences of this nature.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved as of the date of this response.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

M. P. Alexich
Vice President

Kelm 11-28-84

am

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
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