

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

January 8, 1986
AEP:NRC:0970

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC Report Nos. 50-315/85033(DRS) and 50-316/85033(DRS)


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

Dear Mr. Keppler:

This letter is in response to Mr. J. Paperiello's letter dated December 9, 1985, which forwarded the subject Inspection Reports of the routine safety inspection conducted by your staff at the Donald C. Cook Nuclear Plant during the period October 22 through November 7, 1985. The Notice of Violation attached to Mr. Paperiello's letter identified two violations of 10 CFR 50, Appendix B. The responses to these violations are addressed in the attachment to this letter.

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 1/8/86

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Attachments

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

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The following is Indiana & Michigan Electric Company's response to Inspection Report 315/85033; 316/85033:

NRC Violation No. 1

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

"Contrary to the above, 5 of the 11 responses to action requests associated with three audits reviewed were not submitted within the 30 day period established by Revision 1 of AEPSC Procedure No. 18.2. This item was identified as NRC Violation No. 315/84016-02B; 316/84018-02B during a previous inspection, and the action taken to correct it was not effective."

Corrective Action Taken And The Results Achieved

On December 16, 1985, the D. C. Cook Plant Manager issued a memo to all plant departments, Construction Organization and the Plant Administrative Compliance Coordinators who have prime responsibility for ensuring that regulatory commitments are met. This memo identified the items of noncompliance contained in IE Inspection Report 50-315/85033 (DRS); 50-316/85033 (DRS). Contained within the text of this memo were objectives and direction on responding to audit findings. In the past, many of the audit findings were maintained open until all aspects of the corrective actions were implemented. This led to a comprehensive resolution to the audit findings before they were closed. However, at times this also led to failure to meet deadlines prescribed by industry standards and criteria established by the plant's Quality Assurance Program. Definitive guidance and direction relative to meeting the response time limit are also contained in this memo.

Since the last NRC audit, a concentrated effort has been put forth by the plant organization in resolving and closing action requests. The current plant objective is to respond to all action requests within the time frame stipulated. This will be monitored by the QC Department's weekly status report and further reviewed by senior plant management as described below.

Corrective Action Taken To Avoid Further Noncompliance

Plant management has taken steps to ensure that all audit responses, action requests, etc., are addressed in a timely manner. Appropriate attention will be given to ensure the timely submittal of all responses to QA action requests.

Date When Full Compliance Will Be Achieved

As of January 2, 1986, no items that were due from QA audits at the plant were overdue.

NRC Violation No. 2

"10 CFR 50, Appendix B, Criterion V, as implemented by the D. C. Cook Operations Quality Assurance Program, requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

"Contrary to the above, the inspector identified the following:

- a. An index of technical specifications indicating the latest revision was not maintained by Document Control as required by paragraph 3.7 of PMI-2030.
- b. Fifty-four document transmittals were not returned within ten days as required by paragraph 3.5.1 of PMI-2030."

Corrective Action Taken And Results Achieved

- a) Plant Document Control receives an index for Technical Specifications for each amendment from AEPSC Nuclear Safety and Licensing. This index identifies each technical specification page, most current amendment and effective date. This index is issued by Plant Document Control with each Technical Specification change per the requirements of PMI-2030, paragraph 3.7.

We believe that the inspector meant to reference DCC equipment specifications rather than technical specifications. An index of these documents is issued periodically by the AEPSC Quality Assurance (QA) Department and maintained by Document Control. This index, "DCC Specification Issue Record," is not updated with each revision to a specification, and we agree that this does not meet the requirement of PMI-2030. There is no corrective action required for part "a" of this violation as cited. However, for DCC specifications, the Information and Records Center has completed a 100% inventory of the specification file, has marked the most current DCC Specification Issue Record with the latest revision and distributed it for Plant reference. This was completed on December 6, 1985.

- b) We agree with part "b" of the violation in that inadequate attention was given to the return of document transmittals within the time frame required by PMI-2030. Additional attention was given to the document transmittals such that all past due plant acknowledgments were returned by January 7, 1986. However, 15 of the offsite acknowledgments have not been returned. The appropriate plant procedure is being changed such that offsite document receipt acknowledgments are not required.

Corrective Action Taken To Avoid Further Noncompliance

- a) Relative to DCC Specifications, the AEPSC will begin to issue monthly updates to the "DCC Specification Issue Record" commencing January 15, 1986. This update will be issued monthly until otherwise directed by the AEPSC Manager of QA.



- b) Future noncompliance with the receipt acknowledgment requirement will receive prompt followup.

Date When Full Compliance Will Be Achieved

Full compliance for part "a" of the violation will be achieved by January 15, 1986 when the initial monthly update to the "DCC Specification Issue Record" is issued.

Full compliance with part "b" of the violation was achieved on January 8, 1986 when the appropriate plant procedure was modified.

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