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ALEXICH,M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards planned & completed actions to improve vendor controls, per 880523 meeting.

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INDIANA
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AEP:NRC:1042A

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
ACTIONS TO IMPROVE THE QUALITY ASSURANCE PROGRAM

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: A. B. Davis

June 10, 1988

Dear Mr. Davis:

In response to your staff's request following our meeting on May 23, 1988, we are submitting the description of the actions we will take to enhance our Quality Assurance program in the area of vendor controls. The attached description addresses the actions we presented on May 23 in response to the concerns identified in Mr. H. J. Miller's letter dated March 21, 1988 to Mr. David H. Williams.

As discussed in the May 23 meeting, we contracted an outside firm to perform an independent assessment of our vendor controls. That assessment identified a weakness in our vendor controls (i.e., no formal feedback mechanism which assures all identified vendor deficiencies are addressed in a timely manner). The action we will take to resolve this weakness is also addressed in the attached description.

We have initiated actions to shift the emphasis of our Quality Assurance Program to being "performance-oriented." This shift in emphasis is consistent with the Commission's initiative of focusing licensee's management on ensuring that significant safety problems are either prevented or detected early. The Policy Issue (Secy-87-220) dated August 31, 1987, from Mr. Victor Stello, Jr., indicated that the Commission's objectives are for Quality Assurance Programs (1) to be oriented to actual day-to-day work in progress or actual plant hardware and (2) to be focused on identifying, reporting, and ensuring correction of significant problems. Our shift in emphasis will be to accommodate the Commission's objectives. As an initial step toward these objectives, Mr. Paul A. Barrett has been appointed as Director-Quality Assurance effective June 1, 1988. Mr. Barrett reports directly to the Senior Executive Vice President - Engineering and Construction and has been charged with the responsibility of directing the program adjustments needed to shift the emphasis of our Quality Assurance Program to being performance oriented.

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In addition, we are making other organizational changes to strengthen our Quality Assurance Program. To enhance the effect of Quality Assurance on our engineering organization, our Quality Assurance Manager has been reassigned to an engineering division. To enhance the engineering strength of our Quality Assurance Programs, we are establishing a practice of rotating additional engineers for a one to two-year period into the Quality Assurance Department. The rotation of the additional engineers at the end of the period will also enhance the effect of Quality Assurance in our engineering organization.

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

Sincerely,



M. R. Alexich
Vice President

MPA/eh

Attachment

cc: D. H. Williams, Jr.
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

ATTACHMENT 1 TO AEP:NRC:1042A

PLANNED AND COMPLETED ACTIONS TO

IMPROVE VENDOR CONTROLS

NRC Violation 87022-1A: QA auditors failed to verify that procurement requirements were met during the audit of a supplier of services.

NRC Specific Concern: Important attributes related to storage of records were not evaluated.

Specific Action: Documentation is now available which demonstrates our evaluation of the supplier. Our evaluation concludes that the supplier meets the applicable ANSI N45.2.9 requirements.

NRC Generic Concern: What steps have been taken to assure that future audits will verify procurement requirements?

Generic Action: QA will perform in-line reviews of procurement documents to ensure that significant quality requirements are included in the audits of the vendors.

NRC Violation 87022-01B: Qualification of a supplier that did not have a QA program:

NRC Specific Concern: How was the requirement for a supplier to have a QA program satisfied (for the supplier of record storage services).

Specific Action: An audit of the supplier was performed on February 5, 1987. The audit confirmed that the facility construction met the applicable ANSI N45.2.9 - 1974 requirements and that the controlling procedure was being properly implemented. The AEPSC audit file has now been assembled to readily demonstrate the audited activities.

NRC Generic Concern: NRC stated our response was not clear, in that, the procedure or process we use to determine the acceptability of a vendor QA program was not delineated.

Generic Action: Our process for determining the acceptability of a vendor's QA program will include (1) an assessment of the specific procurement document to identify the applicable 10 CFR 50, Appendix B requirements, ANSI requirements, and other quality standards; (2) audit(s) of the vendor's controls based on the identified requirements and quality standards; and (3) if necessary, supplementary controls invoked by the AEPSC QA program for activities not adequately controlled by the vendor.

NRC Violation 87022 - 02A: Product code index of the Qualified Supplier List (QSL) was not definitive; corrective action appears unacceptable.

NRC Generic Concern: Are we reverting to a supplier list which was shown to be defective? The method of selecting suppliers allows any and all products/services manufactured by a company to be

supplied as nuclear quality if a single product can be shown to be nuclear grade. Also, are subtier suppliers being separately evaluated?

Generic Action: The AEPSC QA program is being revised to expand the scope of the audits of vendors to include: (1) more thoroughly documented assessment(s) of vendor's capability to supply quality products and services, (2) assessment(s) of each significantly different process or activity related to each respective product or service, and (3) assessment(s) of either the subtier supplier directly or assessment(s) of the primary supplier's capability to perform and implementation of audits of subtier suppliers.

NRC Violation 87022-02B: Two improperly qualified suppliers.

NRC Generic Concern: A review of other suppliers on the QSL would not be performed to detect other improperly qualified suppliers.

Generic Action: A review of other suppliers on the QSL will be performed using the expanded audits described in the generic action related to violation 87022-02A. Those vendors having the highest risk of an incomplete QA program will be assessed first. High risk vendors include those that do not have ASME NQA-1 programs. [Vendors with ASME NQA-1 programs are subjected to external audits which minimize the risk of deficient programs]. High risk vendors also include those which supply a large variety of products and services.

AEPSC Generic Plan of Action

The AEPSC QA program will be revised to make QA department an in-line reviewer of all safety related (including regulatory related) procurement documents. The in-line reviews will ensure that significant quality requirements detailed in the procurement documents are included in the audits of the vendors. This increased audit scope will supplement the programmatic 10 CFR 50 Appendix B audits that are already being performed. The audits will be used to place and maintain vendors on the Qualified Suppliers List. For vendors that supply significantly different products or services, the audits will address each of the significantly different processes or activities related to each respective product or service. When subtier suppliers are involved, the audit program will either assess the subtier supplier directly or ensure that the primary supplier's QA program provides adequate control and assessment of the subtier supplier. Any deficiencies in the vendor's QA program, that can not be resolved within the vendor's QA program, will be controlled by the AEPSC QA program to assure appropriate quality requirements are maintained. Documentation will be established to furnish evidence that the audit activities have been completed.

The revision to the QA program will involve:

- (1) Establishing the controls to ensure that the audit plans

include the appropriate scope determined by the procurement document reviews.

- (2) Identifying those vendors which have the highest risk of having incomplete QA programs.
- (3) Modifying our audit plan to expedite our audits of high risk vendors.
- (4) Training our auditors on the expanded scope of their responsibilities.

NRC Violation 87022-1C: Indeterminate quality of the repair of diesel crankshafts.

NRC Specific Concern: No documented basis of what specific evaluations were conducted before the procurement was made for this crankshaft repair service.

Specific Action: A post-implementation dedication plan has been developed by Engineering in conjunction with Quality Assurance for the repair of the diesel crankshafts. The plan, which was developed after a thorough review of the crankshaft design requirements and the repair process, identifies the controls and inspections that were necessary to assure that the quality of the crankshafts was maintained during the repair activities. The controls and inspections identified are post-repair activities. In addition, an independent consultant, Southwest Research Institute, was contacted to conduct a technical and quality assurance review of the repair and make recommendations for the dedication plan and for remedial action if necessary. Their conclusion was that in-process controls or inspections were not necessary. Some additional suggestions were made for post-repair additions to the dedication plan. These suggestions were incorporated into the plan. The crankshafts will remain on hold (i.e., not released for operation) until the final QA and NS&L reviews are complete.

NRC Generic Concern: The dedication program established to prevent future inadequacies (1) did not include a statement that the dedication plans will be developed before procurement*, (2) did not specify that controls and inspections will be established, based on potential failure modes and effects assessments of the component being dedicated, and (3) did not indicate engineering involvement throughout the procurement process (including resolution of any discrepancies).

*NRC concerned that steps need to be taken up front in the procurement process to assure that vendor processes, which can significantly affect components but cannot be monitored or verified as being performed correctly after the fact, are identified.

Generic Action: The AEPSC QA program is being revised to include a procedure which establishes the guidelines and requirements for dedicating commercial grade items for safety-related applications.

Included in this procedure will be a requirement to develop and document dedication plans prior to procurement of any commercial grade equipment, parts, materials or services that are known to be targeted for safety related applications. These dedication plans will assure timely inspection and monitoring activities. For commercial grade items that are purchased for nonsafety related

applications and are later determined to be needed for safety related applications, the dedication procedure will require identification of critical characteristics to be verified. The verification will assure that applicable quality concerns are addressed prior to declaring the affected equipment operable.

In all dedication cases, the dedication plan will be based on an engineering assessment of the potential failure modes of the commercial grade item and the effect those failure modes might have on operability of the safety related equipment or structure. Appropriate controls, inspections, and engineering evaluations will be established in the dedication plan based on the assessment. Discrepancies will be controlled to assure timely resolution.

NRC Violation 87022-03 Improperly certified auditors.

NRC Generic Concern: Other questionable lead auditor certifications may exist. Confirm that the program for providing a detailed breakdown for awarding points toward auditor qualification applies to existing and future auditors. Confirm that the provision of ANSI N45.2.23, paragraph 2.3.1.4 concerning "rights of management" will be followed when minimum experience and education requirements of ANSI N45.2.23 are not met.

Generic Action: A reassessment of our program for certifying lead auditors will be performed. Our program will assure that a detailed breakdown for awarding points is provided and that verification is made of those credentials acquired external to AEPSC. The provision concerning "rights of management" will be used only in those cases in which the remaining points are well justified.

Finding: AEPSC does not always control items and services which do not conform to requirements. [Receipt inspection findings not included in vendor evaluations]

Finding: AEPSC QA practices and procedures do not provide for consideration of all supplier performance information. [Industry audit findings not included in vendor evaluations]

AEPSC Plan of Action

The QA program will be revised to establish a formal feedback mechanism to assure deficiencies in vendors QA programs are promptly assessed. The assessment will ensure deficient practices do not result in defective products and services significantly affecting the safety of the plant. Sources of deficient vendor QA programs will include receipt inspection, problem (nonconformance) reports, vendor notifications, and industry reports.

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 AUTH.NAME AUTHOR AFFILIATION
 ALEXICH,M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP.NAME RECIPIENT AFFILIATION
 DAVIS,A.B. Document Control Branch (Document Control Desk)

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Power Company
P.O. Box 16631
Columbus, OH 43216

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Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: A. B. Davis

June 10, 1988

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Mr. A. B. Davis

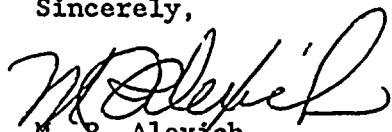
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Sincerely,



M. R. Alexich
Vice President

MPA/eh

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- (2) Identifying those vendors which have the highest risk of having incomplete QA programs.
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In all dedication cases, the dedication plan will be based on an engineering assessment of the potential failure modes of the commercial grade item and the effect those failure modes might have on operability of the safety related equipment or structure. Appropriate controls, inspections, and engineering evaluations will be established in the dedication plan based on the assessment. Discrepancies will be controlled to assure timely resolution.

NRC Violation 87022-03 Improperly certified auditors.

NRC Generic Concern: Other questionable lead auditor certifications may exist. Confirm that the program for providing a detailed breakdown for awarding points toward auditor qualification applies to existing and future auditors. Confirm that the provision of ANSI N45.2.23, paragraph 2.3.1.4 concerning "rights of management" will be followed when minimum experience and education requirements of ANSI N45.2.23 are not met.

Generic Action: A reassessment of our program for certifying lead auditors will be performed. Our program will assure that a detailed breakdown for awarding points is provided and that verification is made of those credentials acquired external to AEPSC. The provision concerning "rights of management" will be used only in those cases in which the remaining points are well justified.

Finding: AEPSC does not always control items and services which do not conform to requirements. [Receipt inspection findings not included in vendor evaluations]

Finding: AEPSC QA practices and procedures do not provide for consideration of all supplier performance information. [Industry audit findings not included in vendor evaluations]

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The QA program will be revised to establish a formal feedback mechanism to assure deficiencies in vendors QA programs are promptly assessed. The assessment will ensure deficient practices do not result in defective products and services significantly affecting the safety of the plant. Sources of deficient vendor QA programs will include receipt inspection, problem (nonconformance) reports, vendor notifications, and industry reports.