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 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T.E. Document Control Branch (Document Control Desk)

SUBJECT: Withdraws commitment in response to 850830 CAL re QA audits
 of Tech Spec surveillances & LCO.

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AEP:NRC:0858D

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
Withdrawal of Commitments Related to Quality Assurance Audits
of Technical Specification Surveillances and Limiting Conditions
for Operation

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

Attention Dr. T. E. Murley

October 30, 1990

Dear Dr. Murley:

This letter constitutes a withdrawal of commitments identified in response to the Confirmatory Action Letter dated November 17, 1983 (AEP:NRC:0858) and the verbal commitment of Mr. M. P. Alexich, AEPSC, to Mr. C. E. Norelius in response to the Confirmatory Action Letter dated August 30, 1985.

In response to the CAL dated November 17, 1983, we submitted letter AEP:NRC:0858 dated January 29, 1984 which details actions to be undertaken as part of the Regulatory Performance Improvement Program (RPIP). AEP:NRC:0858 states that "For the surveillance verification portion, the program will audit each section of the Technical Specifications for each unit twice per year on a sampling basis" and that "once per quarter a representative sample based on the total number of [LCO] events documented within the Q.A. logbook . . . will be verified for adequate compliance to the action statement requirement(s) for the applicable power operational mode in which the event occurred."

Our documented understanding of a verbal commitment to the CAL dated August 30, 1985 states that "...you [licensee] will expand, by October 31, 1985, your corporate Q.A. audit program for surveillance testing as specified in your January 20, 1984 letter (AEP:NRC:0858) to two surveillances per week on an ongoing basis."

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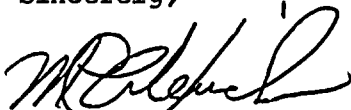
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The above commitments are hereby withdrawn because of the sustained significant improvement related to Technical Specification surveillances and LCO compliance; and the significant QA manpower expenditure associated with these QA actions. Attachment 1 to this letter describes the compliance history associated with the subject commitments and indicates the significant improvement made.

The elimination of the subject commitments will permit the QA audit activities to be more responsive to real time performance-based initiatives and to have the flexibility to respond to more significant plant performance indicators. Thus, the audit activities would be providing more meaningful feedback on the effectiveness of the QA controls which are more deserving of management attention.

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. P. Alexich
Vice President

MPA/nlh
Attachment

cc w/attach:
D. H. Williams, Jr.
A. A. Blind - Bridgman
R. C. Callen
G. Charnoff
A. B. Davis - Region III
NRC Resident Inspector - Bridgman
NFEM Section Chief

ATTACHMENT 1 TO AEP:NRC:0858D

COMPLIANCE HISTORY

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Technical Specification Surveillance Verification

Since the verbal commitment to the August 30, 1985 CAL, the Quality Assurance Department has reviewed 517 Technical Specification surveillance requirements (as of June 30, 1990). Of the 517 requirements reviewed, 94 deficiencies were identified.

Of the 94 identified deficiencies, two were determined to be reportable and these resulted in the generation and submittal of LER 315/85-072 and LER 315/85-072-01. (Refer to Figure 1.) Both LER's documented noncompliance with required surveillance intervals relative to seismic monitoring instrumentation. Upon calibration, the as-found status of the subject instrumentation was determined to be within Technical Specification criteria and the surveillance intervals were subsequently revised. These items are considered to be corrected and it is concluded that the health and safety of the public were not affected. Further, the vast majority of the remaining 92 deficiencies are the direct result of conservative programmatic controls designed to assure Technical Specification action statements are adequately addressed in procedures and to assure adequate tracking of surveillance intervals. None are considered to have created a significant safety concern.

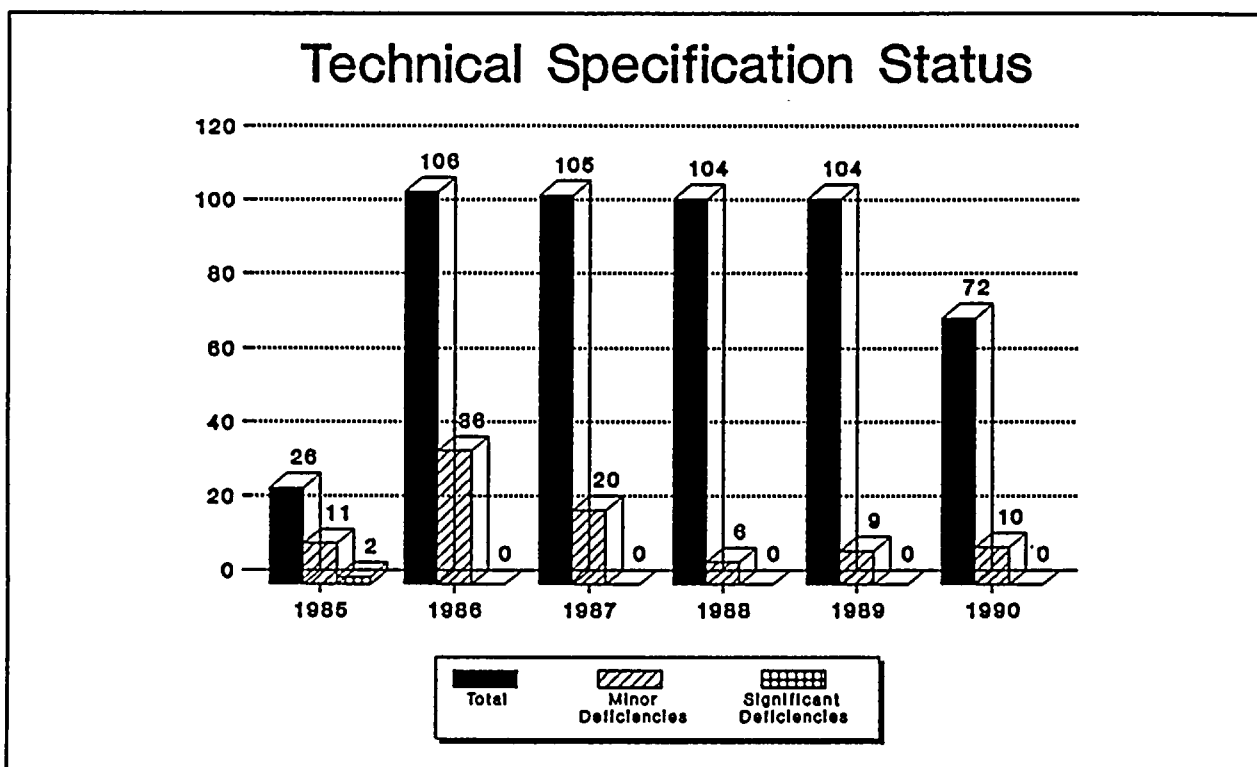


Figure 1 Except for the conditions reported via the two LER's, no safety significant deficiencies have been identified.

LCO Compliance Verification

Compliance to LCO action statements, as verified by Quality Assurance Department audits, has been found to be highly effective. Audits for the 1985 through 1990 timeframe have reviewed 585 action statements (as of June 30, 1990). Of the 585 action statements reviewed, 27 deficiencies were identified.

Of the 27 identified deficiencies, one was determined to be reportable and resulted in the generation and submittal of LER 316/86-02. (Refer to Figure 2.) This LER documented four instances of noncompliance with required surveillance intervals relative to estimation of condenser evacuation system flow at a frequency of once every four hours. Since the maximum time the surveillance interval was exceeded was approximately 2 hours and 18 minutes, and all flow rates recorded were within the expected range, it is concluded that the health and safety of the public were not affected. Further, the remaining 26 deficiencies are the result of conservative programmatic controls designed to assure LCO compliance and are not considered to be of a significant nature.

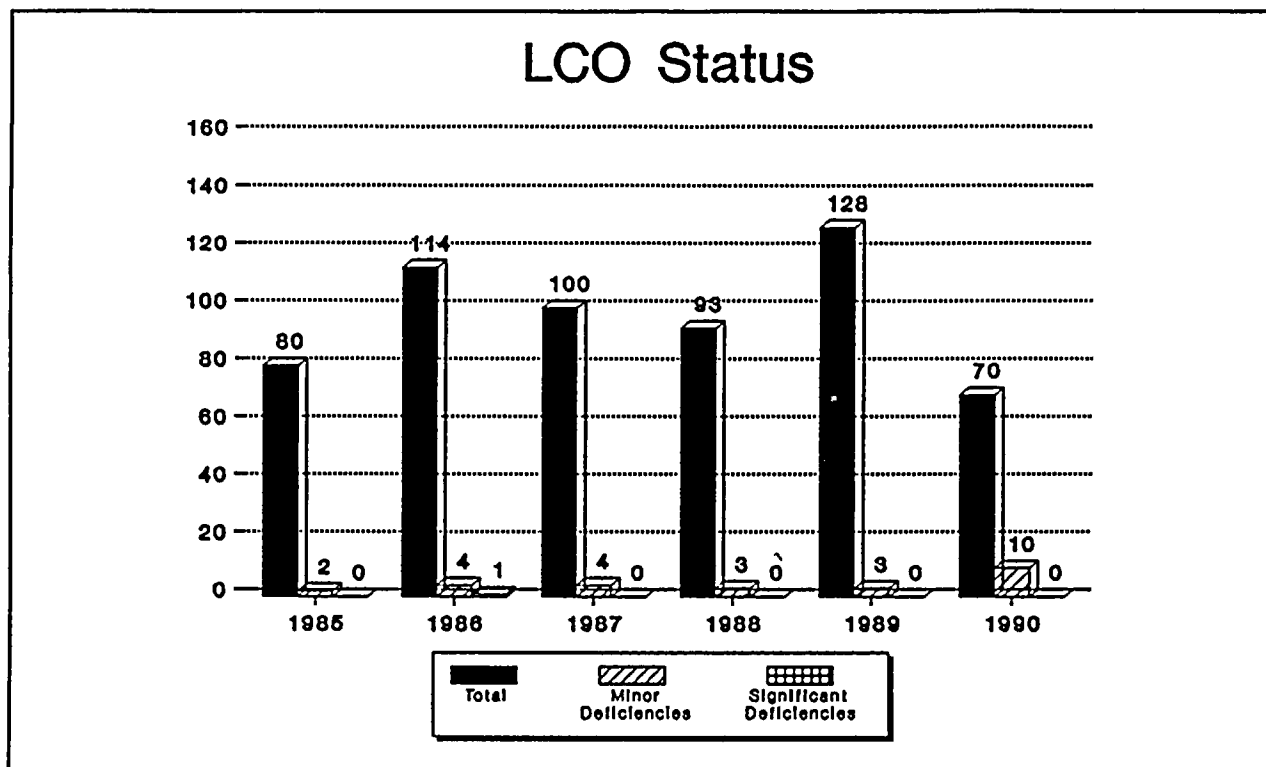


Figure 2

