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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
 DAVIS, A.B. Region 3 (Post 820201)

SUBJECT: Requests concurrence for delay in submittal of adverse findings to allow time for investigation.

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AEP:NRC:0847T

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
INTERPRETATION OF ANSI N45.2.12 - 1977
COMPLETION OF CORRECTIVE ACTION WITHIN 30 DAYS

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

Attention Mr. A. B. Davis

October 30, 1990

Dear Mr. Davis:

Based on a discussion on October 17, 1990 with Mr. M. Phillips of your staff, Cook Nuclear Plant's interpretation of ANSI N45.2.12 - 1977 paragraph 4.5.1 is acceptable. Specifically, paragraph 4.5.1, which addresses audited organizations, requires that responses to adverse findings ". . . clearly state the corrective action taken or planned to prevent recurrence. In the event that corrective action cannot be completed within thirty days, the audited organization's response shall include a scheduled date for corrective action."

Our interpretation of paragraph 4.5.1 for Cook Nuclear Plant concludes that certain circumstances warrant more than 30 days to completely investigate the cause and/or total impact of an adverse finding. For those circumstances, an initial 30 day response would be provided which addresses a schedule for known corrective actions, the reason why additional investigation time is needed, and a schedule for completion of the investigation (which may result in additional scheduled corrective actions). Once the investigation is completed, an updated response, which delineates all corrective/preventive actions (and the respective schedules, if necessary) would be provided.

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Mr. A. B. Davis

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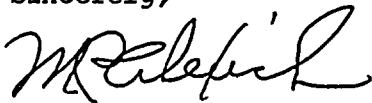
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Though not a frequent occurrence, there are occasions in which certain adverse findings necessitate extensive investigations to ensure that the full impact and scope of the adverse findings are identified. For these occasions, we have concluded that a complete and thorough investigation is more important than premature and incomplete corrective actions. Though paragraph 4.5.1 does not explicitly address the investigation portion of adverse findings, we believe that the above interpretation is consistent with the intent of paragraph 4.5.1 in ensuring timely and complete corrective actions.

Your staff's written concurrence of the subject interpretation would be appreciated.

This document has been prepared following Corporate procedures that 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

cc: D. H. Williams, Jr.
T. G. Colburn - NRC, Washington, DC
NRC Resident Inspector - Bridgman