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 SUBJECT: Forwards ^{Proposed} "Updated QA Program Description for Cook Nuclear
 Plant," dtd Jul 1991.

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AEP:NRC:0847V
10 CFR 50.54(a)(3)

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
PROPOSED REVISION TO THE 1991 UPDATED
QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)

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

Attn: T. E. Murley

April 16, 1991

Dear Dr. Murley:

This letter and its attachments constitute a proposed revision to the 1991 Updated Quality Assurance Program Description (QAPD).

Attachment 1 to this letter addresses each of the specific changes (other than the general repagination). The entire QAPD has been redated July 1991 and is enclosed as Attachment 2. The proposed changes addressed in Attachment 2 to this letter are marked with margin bars.

As provided in 10 CFR 50.54(a)(iv), the proposed changes shall be regarded as accepted by the Commission upon receipt of a letter to this effect, or 60 days after submittal, unless otherwise notified by the Commission.

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,

A handwritten signature in cursive script, appearing to read 'E. E. Fitzpatrick for'.

E. E. Fitzpatrick
Vice President

ldp
Attachments

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PDR ADOCK 05000315
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Dr. T. E. Murley

-2-

AEP:NRC:0847V

cc: D. H. Williams, Jr.
A. A. Blind
J. R. Padgett
G. Charnoff
A. B. Davis - Region III
NRC Resident Inspector - Bridgman
NFEM Section Chief

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AEP:NRG:0847V
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NRC Resident Inspector - Bridgman

NFEM Section Chief

Attachment 1 to AEP:NRC:0847V

Specific Changes to the QAPD

Section(s)

Proposed Changes(s)

Policy Statement

1.7.1.2.1

1.7.1.2.2

1.7.1.2.3

1.7.1.2.5

1.7.2.2.1

Figure No. 1.7-1

Figure No. 1.7-3

Title changed to reflect new corporate management structure; i.e., from "Chairman of the Board and Chief Executive Officer" to "President and Chief Executive Officer."

1.7.1.2.5

1.7.2.1

1.7.2.2.5

1.7.6.2.1

Clarification: Added the word "Updated"; i.e., "Updated FSAR..."

1.7.1.2.2

Fourth paragraph clarification: Added the word "Program"; i.e., "Cook Nuclear Plant Quality Control Program..."

1.7.1.2.5

Quality Assurance Division

Second paragraph, fifteenth item clarification: Included the words "audits or"; i.e., "Conduct in-process QA audits or surveillances..."

1.7.1.2.5

QA Auditor Qualification
and Certification Program

Deleted the words "Orientation, Training" from the subheading; added the word "Auditor." Also deleted reference to QA providing a general training program to AEPSC personnel engaged in activities affecting the quality of safety-related item. This responsibility has been reassigned to the Nuclear Operations Division and is now addressed under those responsibilities (page 1.7-18)

1.7.1.2.5

Nuclear Operations Division

Deleted reference to Nuclear Operations Division middle management. This allows for lower level reorganization, but maintains delineated divisional responsibilities.

Section(s)

Proposed Changes(s)

1.7.1.2.5 (cont.)
Nuclear Operations Division

Included additional item (#42) to reflect current Nuclear Operations Division responsibilities regarding development and implementation of training for AEPSC personnel engaged in activities affecting the quality of safety-related items.

1.7.1.2.5
AEPSC Engineering and Design

Included additional paragraph regarding AEPSC Electrical Engineering and System Planning Departments' responsibilities with regard to Cook Nuclear plant.

1.7.1.2.5
Civil Engineering Department

Deleted reference to Civil Engineering Department middle management. Delineated Department responsibilities are maintained. Also added the words "technical aspects for the" to further clarify Civil Engineering Department's responsibilities with regard to Cook Nuclear Plant.

1.7.1.2.5
Design Department

Deleted reference to Design Department middle management. In addition, Item (#7) was rewritten to clarify the Design Department's responsibilities with regard to the NSDRC and the NSDRC subcommittees.

1.7.1.2.5
Nuclear Engineering
Department

Deleted reference to Nuclear Engineering Department middle management. In addition, included "nuclear steam supply" in Item (#2) to further clarify the Nuclear Engineering Department's responsibilities with regard to Cook Nuclear Plant.

Section(s)Proposed Changes(s)

1.7.1.2.5
Project Management and
Construction Department

Deleted reference to Project Management and Construction Department middle management. Also added item regarding NSDRC participation.

1.7.1.2.5
Purchasing and Stores
Department

Included additional items (i.e., #2 and #9) to reflect the Purchasing and Stores Department's current responsibilities with regard to the Cook Nuclear Plant. In addition, for clarification in Item #4, deleted reference to "I&M Purchasing Department" and replaced it with "Cook Plant Site Purchasing Section". Also deleted reference to notification of suppliers, I&M Purchasing Department and/or Cook Nuclear Plant Stores Supervisor with regard to supplier acceptability status.

1.7.2.2.4

Included additional paragraphs for further clarification of Nuclear Engineering Procedures (NEPs)

1.7.2.2.5

First paragraph: Deleted third sentence, "Imposition of these guides/standard..." to eliminate confusion or misinterpretation by the reader/reviewer. This statement now expanded and appears in Section 1.7.4.2.3.

1.7.3.2.1
1.7.3.2.2

Changes to these are included to accommodate more efficient handling of design changes that would have an insignificant seismic effect on safety related items. Specifically, changes that would introduce only insignificant seismic effects (e.g., placing a non-safety related instrument on a safety related control panel) would be processed via that Plant Modification (PM) process. The PM process has adequate controls to assure that the changes are limited to

Section(s)

Proposed Changes(s)

1.7.3.2.1 (cont.)
1.7.3.2.2

insignificant effects. The PM process also provides for more expedient and efficient processing, thus allowing our engineers more time to focus their attention on more significant safety issues.

1.7.3.2.13

Editorial change; clarified the previously used word "mechanism."

1.7.4.2.1

First paragraph: 3) Included the phrase "...or by the dedication plan process" to further define the implementation of procurement control instructions and procedures. In addition, the third paragraph was rewritten to further clarify responsibilities.

1.7.4.2.2

First paragraph: Deleted "as the source document..." in the first sentence and "... for the Cook Nuclear Plant (DCC Specifications)" in the second sentence, for grammatical clarification. In addition, the second paragraph was rewritten to further clarify procurement of safety related items or services.

1.7.4.2.3

Item b): Statement added to accurately depict how imposition is implemented.

1.7.7.2.1

Second paragraph (last sentence): rewritten for grammatical clarification.

1.7.7.2.2

Deleted the words "and upgrading"

Section(s)

Proposed Changes(s)

1.7.7.2.8

Rewritten to further clarify supplier record retention responsibility.

1.7.7.2.9

Rewritten to clarify evaluation of supplier's capability to furnish valid certificates.

1.7.9.2.2

1.7.9.2.3

Deleted reference to "AEPSC Staff Engineer - Chief Metallurgist (NDE Administrator)"; replaced with "AEPSC Cognizant Engineer - Welding and NDE Administrator" to reflect current position title.

1.7.9.2.2

Fourth paragraph, first sentence: For further clarification, added the phrase "or in the approved contractor's manual."

1.7.9.2.3

Second paragraph: Replaced "AEPSC Welding Specification" with "AEP Welding Manual." In addition, included the phrase "in accordance with AEPSC procedures."

1.7.13.2.3

For further clarification, included the phrase, "or are otherwise specified on the procurement order."

1.7.17.2.1

Item h: Included "dedication plans."
Item i: Deleted the phrase "(which are also classified as safety related item)."

1.7.18.2.4

Second paragraph: Included "NSDRC membership."

Figure No. 1.7-4

Deleted reference to Quality Assurance Division support personnel on the organization flow chart.

Section(s)

Proposed Changes(s)

Appendix B

Item 12: Included reference to "ANSI N45.2.12."

Appendix B

Item 12b: Editorial change; corrected name of agency.

Appendix B

Item 12c: Added Section 4.5.1 regarding responses to adverse audit finding. This issue was previously deemed acceptable by the NRC when submitted in AEP submittal letter AEP:NRC:0847T dated October 30, 1990.

The entire QAPD was repaginated. Proposed changes in content are reflected by margin bars in the margin to the right of the text.

Please note: A margin bar followed by an asterisk (i.e., /*) reflects an editorial change, (e.g., grammar; punctuation) only.