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SUBJECT: Forwards proposed rev to 1991 updated QA program
 description, to supplement 920421 ltr.

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AEP:NRC:0847X
10CFR50.54(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
ADDITIONAL INFORMATION FOR THE PROPOSED REVISION
TO THE 1991 UPDATED QUALITY ASSURANCE PROGRAM DESCRIPTION

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

Attn: T. E. Murley

June 15, 1992

Dear Dr. Murley:

This letter and its attachments supplement our letter AEP:NRC:0847W, dated April 21, 1992, concerning the proposed revision of the 1991 Updated Quality Assurance Program Description (QAPD).

Based on a discussion between Mr. N. C. Choules of the Region III staff and Mr. P. A. Barrett, AEPSC Director - Quality Assurance, on June 4, 1992, explanations for three of the proposed QAPD changes are provided in the enclosed revision of page 5 to Attachment 1 to AEP:NRC:0847W. Attachment 1, which provides a summary of the proposed changes, has been expanded to address organizational changes affecting Figure 1.7-1, Figure 1.7-3, and Section 1.7.1.25 previously submitted. In addition, the word "department" has been added to the third paragraph on page 1.7-22 of the QAPD. A new page 1.7-22 is enclosed.

Replacement pages for 1.7-94, 1.7-96, 1.7-110, 1.7-111, and 1.7-112 are also enclosed to correct minor word processing errors included in AEP:NRC:0847W. The revision date of Regulatory Guide 1.58 on page 1.7-94 and Regulatory Guide 1.108 on page 1.7-96 were inadvertently modified. The number of Regulatory Guide 1.58 on pages 1.7-110 and 1.7-111 was inadvertently typed as 1.5. The number of ANSI 18.1 was inadvertently typed as 1.1 on page 1.7-112.

Sincerely,

E. E. Fitzpatrick
Vice President

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P PDR

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Dr. T. E. Murley

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AEP:NRC:0847X

eh

Attachments

cc: D. H. Williams, Jr.
A. A. Blind - Bridgman
J. R. Padgett
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Dr. T. E. Murley

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AEP:NRC:0847X

bc: P. A. Barrett
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M. L. Horvath - Bridgman
D. H. Malin/K. J. Toth
J. B. Shinnock - w/o attachments
W. G. Smith, Jr.
J. F. Stang, NRC - Washington, D. C.
AEP:NRC:0847W
AEP:NRC:0847X
DC-N-6015.1

Section(s)	Proposed Changes(s)
1.7.10.2.4 Pages 62-63	This section has been rewritten to further clarify how the Peer Inspection Program and ANSI N45.2.6 Inspection Program are implemented. This rewrite does not lessen the activities that are inspected or the quality of the inspections being performed.
1.7.13.2.3 Page 69	Revised to reflect the more generic term "procurement document" which includes purchase order, contract, service order, etc.
1.7.17.2.2 Page 76	Revised to reflect a title change (i.e., Records Management Supervisor).
1.7.19.2 Page 82	Updated how fire fighting responsibilities are administered.
Figure 1.7-5	Updated to reflect Plant organizations.
Figure 1.7-1	Updated to reflect Plant organizations.
Figure 1.7-3	Updated to reflect Plant organizations.
1.7.1.25 page 20 (formerly included on page 1.7-12)	The organization responsible for establishing and maintaining a central file for equipment environmental qualification documentation was changed from QA Division to Nuclear Engineering Department.

- Implement the corrective action program, with regard to activities affecting the quality of safety-related items and services, that controls and documents items, services or activities which do not conform to requirements.
- Assist in the preparation of applications for federal, state and local permits relative to installations being made which require such permits.
- Conduct periodic management reviews of the activities of the department to ensure compliance with the objectives of the QA Program, and external technical surveillance, as necessary, of consultants, outside organizations and vendors over which the department is cognizant.
- Establish and maintain a file for QA records.
- Develop, review and approve designs and drawings for mechanical, electrical and structural systems, equipment and facilities of the Cook Nuclear Plant.
- Perform required calculations and analyses, including pipe stress, pipe support design, cable sizing, conduit and cable tray support and structural steel and concrete.
- Assist field personnel in the resolution of problems stemming from the installation of design changes, or from as-found plant conditions, including assigning personnel to the plant.
- Formulate, administer, and implement policies and practices relating to the engineering, and design of the Cook Nuclear Plant.
- Conduct functions so as to be in conformance with the operating licenses of the Cook Nuclear Plant.
- Investigate evaluate and correct problems.
- Coordinate special projects and studies, as required.
- Coordinate the development and maintenance of the computerized Design Drawing Control (DDC) and the Vendor Drawing Control (VDC) programs which include coordinating the programs with interfacing divisions/departments.
- Control the issuance and distribution of drawings for the Cook Nuclear Plant, including monitoring of the Aperture Card Microfilm Program.

6. Reg. Guide 1.37 (3/73)

ANSI N45.2.1 (1973)

- Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants
- Cleaning of Fluid Systems and Associated Components During Construction Phase of Nuclear Power Plants

7. Reg. Guide 1.3 (10/76)

ANSI N45.2.2 (1972)

- Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants
- Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (During the Construction Phase)

8. Reg. Guide 1.39 (10/76)

ANSI N45.2.3 (1973)

- Housekeeping Requirements for Water-Cooled Nuclear Power Plants
- Housekeeping During the Construction Phase of Nuclear Power Plants

9. Reg. Guide 1.54 (6/73)

ANSI N101.4 (1972)

- Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants
- Quality Assurance for Protective Coatings Applied to Nuclear Facilities

10. Reg. Guide 1.58 (9/80)

- Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel

ANSI N45.2.5 (1974)

- Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants

16. Reg. Guide 1.108 (8/77)

- Periodic Testing of Diesel Generator Units used as Onsite Electric Power Systems at Nuclear Power Plants

17. Reg. Guide 1.123 (7/77)

- Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants
- Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants

ANSI N45.2.13 (1976)

18. Reg. Guide 1.144 (1/79)

- Auditing of Quality Assurance Programs for Nuclear Power Plants
- Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants

ANSI N45.2.12 (1977)

19. Reg. Guide 1.146 (8/80)

- Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants
- Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants

ANSI N45.2.23 (1978)

9. Reg. Guide 1.58 - General

Requirement

Qualification of nuclear power plant inspection, examination and testing personnel.

9a. C.2.a(7)

Requirement

Regulatory Guide 1.58 endorses the guidelines of SNT-TC-1A as an acceptable method of training and certifying personnel conducting leak tests.

Exception/Interpretation

I&M takes the position that the "Level" designation guidelines as recommended in SNT-TC-1A, paragraph 4 do not necessarily assure adequate leak test capability. I&M maintains that departmental supervisors are best able to judge whether engineers and other personnel are qualified to direct and/or perform leak tests. Therefore, I&M does not implement the recommended "Level" designation guidelines.

It is I&M's opinion that the training guidelines of SNT-TC-1A, Table I-G, paragraph 5.2 specifically are oriented towards the basic physics involved in leak testing, and further, towards individuals who are not graduate engineers. I&M maintains that it meets the essence of these training guidelines. The preparation of leak test procedures and the conduct of leak tests at Cook Nuclear Plant is under the direct supervision of Performance Engineers who hold engineering degrees from accredited engineering schools. The basic physics of leak testing have been incorporated into the applicable test procedures. The review and approval of the data obtained from leak tests is performed by department supervisors who are also graduate engineers.

I&M does recognize the need to assure that individuals involved in leak tests are fully cognizant of leak test procedural requirements and thoroughly familiar with the test equipment involved. Plant performance engineers receive routine, informal orientation on testing programs to

ensure that these individuals fully understand the requirements of performing a leak test.

9b. C5, C6, C7, C, C10

Exception/Interpretation

I&M takes the position that the classification of inspection, examination and test personnel (inspection personnel) into "Levels" based on the requirements stated in Section 3.0 of ANSI N45.2.6 does not necessarily assure adequate inspection capability. I&M maintains that departmental and first line supervisors are best able to judge the inspection capability of the personnel under their supervision, and that "Level" classification would require an overly burdensome administrative work load, could inhibit inspection activities, and provides no assurance of inspection capabilities. Therefore, I&M does not implement the "Level" classification concept for inspection, examination and test personnel.

The methodology under which inspections, examinations and tests are conducted at the Cook Nuclear Plant requires the involvement of first line supervisors, engineering personnel, departmental supervisors and plant management. In essence, the last seven (7) project functions shown in Table 1 to ANSI N45.2.6 are assigned to supervisory and engineering personnel, and not to personnel of the inspector category. These management supervisory and engineering personnel, as a minimum, meet the educational and experience requirements of "Level II and Level III" personnel, as required, to meet the criteria of ANSI 1.1 which exceeds those of ANSI N45.2.6. In I&M's opinion, no useful purpose is served by classification of management, supervisory and engineering personnel into "Levels."

Therefore, I&M takes the following positions relative to regulatory positions C5, 6, 7, and 10 of Regulatory Guide 1.58.

C-5 Based on the discussion in 9b, this position is not applicable to the Cook Nuclear Plant.

- C-6 Replacement personnel for Cook Nuclear Plant management, supervisory and engineering positions subject to ANSI 18.1 will meet the educational and experience requirements of ANSI 18.1 and therefore, those of ANSI N45.2.6.

Replacement inspection personnel will, as a minimum, meet the educational and experience requirements of ANSI N45.2.6, Section 3.5.1 - "Level I."

- C-7 I&M, as a general practice, complies with the training recommendations as set forth in this regulatory position.

- C-8 All I&M inspection, examination and test personnel are instructed in the normal course of employee training in radiation protection and the means to minimize radiation dose exposure.

- C-10 I&M maintains documentation to show that inspection personnel meet the minimum requirements of "Level I," and that management, supervisory and engineering personnel meet the minimum requirements of ANSI 18.1.

10. N45.2.8,

10a. Sec. 2.9e

Requirement

Section 2.9e of N45.2.8. lists documents relating to the specific stage of installation activity which are to be available at the construction site.

Exception/Interpretation

All of the documents listed are not necessarily required at the construction site for installation and testing. AEPSC and I&M assure that they are available to the site, as necessary.