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 MURLEY, T.E. Document Control Branch (Document Control Desk)

SUBJECT: Forwards "Updated QA Program Description for Cook Nuclear Plant."

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 TITLE: 50.54.a.3 & 50.55.f.3 Change to SAR QA Program

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AEP:NRC:0847Y
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
PROPOSED REVISION TO THE 1992 UPDATED
QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)

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

Attn: T. E. Murley

May 10, 1993

Dear Dr. Murley:

This letter and its attachments constitute a proposed revision to the 1992 Updated Quality Assurance Program Description (QAPD).

Most of the proposed changes are (1) a result of organizational adjustments to accommodate the retirement of a senior manager or (2) editorial.

We believe that only one of the proposed changes constitutes a reduction in previous QA program commitments. In Section 1.7.3.2.9, the commitment to "individually" document and obtain "advanced" approval to use a supervisor to perform design verifications has been reduced. To individually document in advance, when a supervisor is going to perform design verification, increases administrative burdens with no increase in safety. The design documentation, itself, identifies who performed design verification and also contains management approval.

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Dr. T. E. Murley


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Attachment 1 to this letter addresses each of the specific changes (other than the general repagination). The proposed changes can readily be identified by the highlighting in Attachment 2, which is the proposed QAPD.

As provided by 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. Realizing the simplicity of the proposed changes, the Commission approval of the proposed changes within 60 days would be appreciated.

Sincerely,



E. E. Fitzpatrick
Vice President

eh

Attachments

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

ATTACHMENT 1

SUMMARY OF PROPOSED CHANGES TO THE QAPD

Section(s)	Proposed Changes(s)
Policy Statement 1.7.1.2.1 1.7.1.2.2 1.7.1.2.5 1.7.2.2.1 Figure No. 1.7-1 Figure No. 1.7-3	Changed to reflect new corporate management structure resulting from the retirement of the Senior Executive Vice President-Engineering and Construction.
Policy Statement Second Paragraph	Editorial change to clarify that the QA program addresses "activities affecting" safety-related "functions".
1.7.1.2.5 under Quality Assurance Division 1.7.2.2.7. c) Figure No. 1.7-4 (page 1.7-91)	Editorial change: Quality Assurance Division (QAD) changed to Quality Assurance (QA) Division. QA Support Section merged with Audits and Procurement Section and QA Engineering Section.
1.7.1.2.5 1.7.15.2.1 1.7.16.2.2 1.7.17.2.1 1.7.18.2.4 1.7.18.2.5	Editorial change: "Problem" changed to "Condition". The term is used to identify conditions that warrant attention and/or resolution. The term was changed to bring consistency throughout the Nuclear Organization.
1.7.1.2.5 Nuclear Operations 1.7.3.2.4	Editorial change: Nuclear Operations Department (NOD) changed to Nuclear Operation (NO) Department.
1.7.1.2.5 (revised page 1.7-16)	Editorial change: Action Item Tracking System (AIT) changed to Action Item Tracking (AIT) system.

Section(s)	Proposed Changes(s)
<p>1.7.1.2.5 (revised page 1.7-17)</p> <p>(page 1.7-17)</p>	<p>Responsibility to "Coordinate operations within AEPSC that support the Cook Nuclear Plant Facility Data Base (FDB)" moved to the Nuclear Engineering Department (revised page 1.7-19).</p> <p>Nuclear Operations responsibility clarified to include emergency planning and "support" of the security program. Security planning, reviewing security facilities, and development of the employee fitness for duty/background screening program are performed by the Cook Plant staff. These responsibilities are included in the administration of human resource activities and of the approved physical security program addressed on page 1.7.23 (July, 1993).</p>
<p>1.7.1.2.5 Nuclear Engineering</p>	<p>Editorial change: Nuclear Engineering Department changed to Nuclear Engineering (NE) Department.</p>
<p>1.7.1.2.5 Purchasing and Stores (revised page 1.7-29)</p>	<p>Editorial changes: Added "blanket orders" to type of procurement documents.</p> <p>Relocated the word "standard" for clarity.</p> <p>Added "services" to clarify that services, as well as, items are purchased, and therefore addressed by training sessions.</p>
<p>1.7.2.1 (revised page 1.7-30)</p>	<p>Editorial change: Changed "part" H to "Subpart" H.</p>
<p>1.7.2.2.3</p>	<p>Editorial change: "1" criteria of 10CFR50, Appendix B changed to "18" criteria.</p>
<p>1.7.3.2.2</p>	<p>Editorial change: "safety items" changed to "safety-related items".</p>

Section(s)	Proposed Changes(s)
1.7.3.2.9	Proposing to eliminate the commitment to "individually" document the need and obtain "advanced" management approval when a supervisor is used for design verification. The current requirement is an unnecessary administrative burden, since the need for supervisors performing the design verification and the management approval are included in the design package, prior to operability of the associated structure, system, or component.
1.7.3.2.9	Editorial change: Deleted the number "4" in front of the associated sentence.
1.7.4.2.1	<p>Editorial change: Revised "purchased materials, components, and services associated with safety-related structures or systems are" to "safety-related items and services are". The proposed change is consistent with the definition of "item" included in ANSI N45.2.10.</p> <p>Added "Appropriate technical and" to clarify that procurement procedures address technical, as well as, quality requirements.</p>
1.7.7.2.1	Editorial change: To clarify that distributors are addressed as suppliers within the QA program.
1.7.7.2.5	<p>Editorial changes: Insert "the" to improve grammar.</p> <p>Changed "PMI on receipt inspection of safety-related items addresses the program for" to "program for receipt inspection of safety-related items addresses". The QA program includes procedures, other than the PMI, for receipt inspection.</p>

Section(s) '	Proposed Changes(s)
1.7.7.2.5 1.7.7.2.6	Sections revised to clarify that certain items (such as nuclear fuel) involve additional or special QA program activities to supplement receipt inspection.
1.7.7.2.7	Editorial change: Added "contractors working under their own" to further clarify that the contractors being addressed are not working directly under the Cook Nuclear Plant specific QA program.
1.7.10.2.4	Editorial changes: Hyphen (-) added to the term safety-related; and title of ANSI N45.2.6 corrected.
1.7.12.1	Editorial change: "systems, components, and structures" changed to "structures, systems, and components" to be consistent with terminology elsewhere in the QA program.
1.7.16.2.2	Second paragraph revised to clarify which condition reports will be reviewed by the PNSRC, since the terms "problem" and "significant problem" are not used to characterize deficiencies or adverse conditions. The proposed change is consistent with Technical Specification 6.5.1.6, which addresses PNSRC responsibilities.
1.7.17.2.2	Editorial change: "Nuclear" added to the title of the Nuclear Records Management Supervisor.
1.7.18.2.4	AEPSC Senior Executive Vice President - Engineering and Construction deleted as recipient of NSDRC audit reports due to his retirement. A replacement was not made for the vacated position.

Section(s)	Proposed Changes(s)
Figure 1.7-2 (page 1.7-89)	Changed to reflect merger of Michigan Power with Indiana Michigan Power Company, and to remove unnecessary detail about companies not involved with Cook Nuclear Plant.
Appendix B, Section 4 (revised page 1.7-105)	Editorial change: Hyphen (-) added to the term safety-related.
Appendix B, Section 9b.	Editorial change: The number "8" added to the pertinent regulatory positions, and to ANSI 18.1.
Appendix B, Section 11c.	Editorial change: The number "8" added to NUREG-0800.
Appendix B, Section 13e.	Editorial change: Corrected reference to item 2K under Exception/Interpretation.

ATTACHMENT 2

PROPOSED CHANGES TO THE QAPD