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 RECIP NAME: RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards response to regulatory positions of Reg. Guides 1.58
 & 1.146 & ASI stds in response to Generic Ltr 81-01, 810504
 "Qualification of Insp, Exam & Testing & Audit Personnel."

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INDIANA & MICHIGAN ELECTRIC COMPANY

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September 14, 1981
AEP:NRC:0567

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
Generic Letter 81-01

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Denton:

This letter responds to Mr. Darrell G. Eisenhower's generic letter 81-01 "Qualification of Inspection, Examination, and Testing and Audit Personnel", dated May 4, 1981 which we received on May 13, 1981 and which requested a response in 90 days.

The attached positions reply to the specific regulatory positions of Regulatory Guides 1.58 and 1.146 and the ANSI Standards referenced in each.

Very truly yours,


R. S. Hunter
Vice President

RSH/emc
Attachment

cc: John E. Dolan - Columbus
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A. Regulatory Guide 1.146 - (8/80)/ANSI N45.2.23-1978

Qualification of Quality Assurance Program Audit Personnel For
Nuclear Power Plants

Indiana & Michigan Electric Company (I&MECo) will implement the requirements of ANSI N45.2.23-1978 and Regulatory Guide 1.146 (8/80) with the following exceptions:

1. The I&MECo internal audit program is directed by the Donald C. Cook Nuclear Plant's QA Supervisor who is a qualified lead auditor; and is administered by a designated supervisor who is also a qualified lead auditor.

Audits are, in most cases, conducted by individual auditors, not by "audit teams". These auditors are qualified by established I&MECo procedures, and are assigned by the designated supervisor based on their demonstrated audit capability and general knowledge of the audit subject. In certain cases, this results in an individual other than a "lead auditor" conducting the actual audit function.

Established I&MECo audit procedures require that, in all cases, the audit functions of preparation/organization, reporting of audit findings and evaluation of corrective actions be reviewed by the designated supervisor and approved by the QA Supervisor, thereby meeting the requirements of ANSI N45.2.23-1978 relative to "Lead Auditors", and "Audit Team Leaders".

2. The commitment to ANSI N45.2.23-1978 and Regulatory Guide 1.146 does not apply to the management audit functions performed by the AEPSC Nuclear Safety Design Review Committee in compliance with the Donald C. Cook Nuclear Plant Technical Specifications.

The date for full compliance is December 31, 1981.

B. Regulatory Guide 1.58 (9/80) ANSI N45.2.6-1978

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

Indiana & Michigan Electric Company will implement the requirements of ANSI N45.2.6-1978 with the following exceptions:

1. I&MECo 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 N45.2.6-1978 does not necessarily assure adequate inspection capability. I&MECo 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 inspections capabilities. Therefore, I&MECo does not plan to implement the "level classification" concept for inspection, examination and test personnel.

The methodology under which inspections, examinations, and tests are conducted at the Donald C. 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 N45.2.6-1978 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 they are required to meet the criteria of ANSI 18.1-1971 which exceed those of ANSI N45.2.6. In I&MECo's opinion, no useful purpose is served by classification of management, supervisory, and engineering personnel into "Levels".

2. Therefore, Indiana & Michigan Electric Company takes the following positions relative to regulatory positions C5, 6, 7, 8 and 10 of Regulatory Guide 1.58 (9/80):

C5 - Based on the discussion in B.1 above, this position is not applicable to the Donald C. Cook Nuclear Plant.

- C6 - Replacement personnel for Donald C. Cook Nuclear Plant management, supervision, and engineering positions subject to ANSI 18.1-1971 will meet the educational and experience requirements of ANSI 18.1-1971 and therefore those of ANSI N45.2.6-1978.

Replacement inspection personnel will, as a minimum, meet the educational and experience requirements of ANSI N45.2.6-1978 Section 3.5.1 - "Level I".

- C7 - I&MECo., as a general practice, complies with the training recommendations as set forth in this regulatory position.
- C8 - All I&MECo. 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.
- C10 - I&MECo. is preparing 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 18.1-1971. This effort will be completed by December 31, 1981.

