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SUBJECT: Constitutes request to withdraw proposed changes to 1994
updated QA program description, addressing ltr dtd 950815.

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**INDIANA
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October 11, 1995

AEP:NRC:0847AD

Docket Nos.: 50-315
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
PARTIAL WITHDRAWAL OF A PROPOSED REVISION TO
THE 1994 UPDATED QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)

This letter constitutes a request to withdraw one of the proposed changes to the 1994 Updated Quality Assurance Program Description (QAPD) that was addressed in our letter AEP:NRC:0847AB, dated August 15, 1995.

In our letter AEP:NRC:0847AB, we requested that Appendix B, Section 7b of the QAPD be changed to include an additional exception/interpretation of the commitment to ANSI N45.2.5. The change would have allowed a reduction in commitment from certain in-process quality checks for concrete placements and a reduction in frequency of concrete constituent testing.

We understand that review of this change would delay implementation of the remaining changes addressed in AEP:NRC:0847AB. Therefore, we withdraw our request to change Appendix B, Section 7b at this time. Replacements for pages 1.7-121 through the end of the document (page 1.7-133), which reflect the deletion of this proposed change, are enclosed.

In addition, some of the text was inadvertently omitted on pages 1.7-24 and 1.7-46 of Attachment 2 to AEP:NRC:0847AB. Replacements for these pages are also enclosed. None of the proposed changes addressed in AEP:NRC:0847AB were associated with these omissions.

Sincerely,

for W.E. Smith
E. E. Fitzpatrick
Vice President

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Enclosures

cc: A. A. Blind
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NFEM Section Chief
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ATTACHMENT TO AEP:NRC:0847AB

REPLACEMENT QUALITY ASSURANCE
PROGRAM DESCRIPTION PAGES

- Participate, as assigned, on the AEPSC Condition Assessment Group (CAG).
- Make recommendations and assist in the formulation of policies and practices relating to the design and engineering of office and service buildings, miscellaneous structures and material handling equipment, and provide the general supervision of the engineering of such facilities, structures and equipment.
- Initiate and/or review, approve and control laboratory and field investigations and feasibility studies.
- Prepare and administer equipment, labor and service contracts.
- Arrange for outside engineering, design and consulting assistance, as required.
- Perform shop and field surveillance on equipment being manufactured, fabricated, or installed.
- Provide field services to the Cook Nuclear Plant, including the assigning of personnel, as are required, during construction, normal or forced outages, or as requested.
- Assist in the planning and execution of maintenance work on equipment, facilities, buildings and other structures.
- Supervise maintenance and repairs of all masonry and concrete work at Cook Nuclear Plant, including supplying qualified inspection personnel.
- Direct testing of materials used in concrete and testing of soils to be used in work at the Cook Nuclear Plant.
- Review and recommend concrete mix formulations for all new construction.
- 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.

1.7.3.2.8

Implementation of design changes is coordinated on site by AEPSC site engineering support project engineering. Material to perform the design change must meet the specifications established for the original system, or as specified by the DCP. For those design changes where testing after completion is required, the testing documentation is reviewed by the organization performing the test and, when specified, by the DCP. Further, completed design changes are audited/surveilled by AEPSC QA following installation and testing.

1.7.3.2.9

Changes to design documents, including field changes, are reviewed, approved and controlled in a manner commensurate with that used for the original design. Such changes are evaluated for impact. Information on approved changes is transmitted to all affected organizations.

1.7.3.2.10

Error and deficiencies in, and deviations from, approved design documents are identified and dispositioned in accordance with established design control and/or corrective action procedures.

1.7.3.2.11

Established design control procedures provide for:

- 1) controlled submission of design changes,
- 2) engineering evaluation,
- 3) review for impact on nuclear safety,

7. N45.2.5,

7a. Sec. 2.5.2

Requirement

"When discrepancies, malfunctions or inaccuracies in inspection and testing equipment are found during calibration, all items inspected with that equipment since the last previous calibration shall be considered unacceptable until an evaluation has been made by the responsible authority and appropriate action taken."

Exception/Interpretation

I&M uses the requirements of N18.7, Section 5.2.16, rather than N45.2.5, Section 2.5.2. The N18.7 requirements are more applicable to an operating plant.

7b. Sec. 5.4

Requirement

"Hand torque wrenches used for inspection shall be controlled and must be calibrated at least weekly and more often if deemed necessary. Impact torque wrenches used for inspection must be calibrated at least twice daily."

Exception/Interpretation

Torque wrenches are controlled as measuring and test equipment in accordance with ANSI N18.7, Section 5.2.16. Calibration intervals are based on use and calibration history rather than as per N45.2.5.

8. N45.2.6, Sec. 1.2

Requirement

"The requirements of this standard apply to personnel who perform inspections, examinations and tests during fabrication prior to or during receipt of items at the construction site,

during construction, during preoperational and start-up testing and during operational phases of nuclear power plants."

Exception/Interpretation

Personnel participating in testing who take data or make observations, where special training is not required to perform this function, need not be qualified in accordance with ANSI N45.2.6, but need only be trained to the extent necessary to perform the assigned function.

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, C8, 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 18.1 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, 8 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.

10b. Sec. 2.9e

Requirement

Evidence that engineering or design changes are documented and approved shall be available at the construction site prior to installation.

Exception/Interpretation

Equipment may be installed before final approval of engineering or design changes. However, the system is not placed into service until such changes are documented and approved.

10c. Sec. 4.5.1

Requirement

"Installed systems and components shall be cleaned, flushed and conditioned according to the requirements of ANSI N45.2.1. Special consideration shall be given to the following requirements:" (Requirements are given for chemical conditioning, flushing and process controls.)

Exception/Interpretation

Systems and components are cleaned, flushed and conditioned as determined on a case-by-case basis. Measures are taken to help preclude the need for cleaning, flushing and conditioning through good practices during maintenance or modification activities.

11. N45.2.9

11a. Sec. 5.4, Item 2

Requirement

Records shall not be stored loosely. "They shall be firmly attached in binders or placed in folders or envelopes for storage on shelving in containers." Steel file cabinets are preferred.

Exception/Interpretation

Records are suitably stored in steel file cabinets, or on shelving in containers. Methods other than binders, folders, or envelopes (for example, dividers) may be used to organize the records for storage.

11b. Sec. 6.2

Requirement

"A list shall be maintained designating those personnel who shall have access to the files".

Exception/Interpretation

Rules are established governing access to and control of files as provided for in ANSI N45.2.9, Section 5.3, Item 5. These rules do not always include a requirement for a list of personnel who are authorized access. It should be noted that duplicate files and/or microforms may exist for general use.

11c. Sec. 5.6

Requirement

When a single records storage facility is maintained, at least the following features should be considered in its construction: etc.

Exception/Interpretation

The Cook Nuclear Plant Master File Room and other off-site record storage facilities comply with the requirements of NUREG-0800 (7/81), Section 17.1.17.4.

12. Reg. Guide 1.144/ANSI N45.2.12

12a. Sec. C3a(2)

Requirement

Applicable elements of an organization's Quality Assurance program for "design and construction phase activities should be audited at least annually or at least once within the life of the activity, whichever is shorter."

Exception/Interpretation

Since most modifications are straight forward, they are not audited individually. Instead, selected controls over modifications are audited periodically.

12b. Sec. C3b(1)

Requirement

This section identifies procurement contracts which are exempted from being audited.

Exception/Interpretation

In addition to the exemptions of Reg. Guide 1.144, AEPSC/I&M considers that the National Institute of Standards and Technology, or other State and Federal Agencies which may provide services to AEPSC/I&M, are not required to be audited.

12c. Sec. 3.3

Requirement

An effective audit system shall be established and maintained and shall include the following essential elements:

3.3.7 Provision for verification of effective corrective action on a timely basis

Exception/Interpretation

Verification of the implementation of effective corrective action is performed as indicated in Section 1.7.18.2.11 of this QAPD. Only selected corrective/preventive actions, determined by the auditing organization, will be verified by the auditing organization.

12d. 4.5.1

Requirement

In the event that corrective action cannot be completed within thirty days, the audited organization's response shall include a scheduled date for the corrective action. The audited organization shall provide a follow-up report stating the corrective action taken and the date corrective action was completed.

Exception/Interpretation

The auditing organization will determine when it is necessary for the audited organization to provide a response within thirty days. If the auditing organization does not designate that the response must be completed within the thirty day timeframe and forwarded to the auditing organization, the corrective action document will be processed in accordance with the corrective action program. The program determines the safety significance, extent of the investigation required, investigation due date, and required level of management review and approval. The audited organization will provide follow-up documentation to the appropriate level of management as to the status of the corrective/preventive action. Documentation of follow-up will be provided to the auditing organization when specified by the auditing organization.

13. N45.2.13,

13a. Sec. 3.2.2

Requirement

N45.2.13 requires that technical requirements be specified in procurement documents by reference to technical requirement documents. Technical requirement documents are to be prepared, reviewed and released under the requirements established by ANSI N45.2.11.

Exception/Interpretation

For replacement parts and materials, AEPSC/I&M follow ANSI N18.7, Section 5.2.13, Subitem 1, which states: "Where the original item or part is found to be commercially 'off the shelf' or without specifically identified QA requirements, spare and replacement parts may be similarly procured, but care shall be exercised to ensure at least equivalent performance."

13b. Sec. 3.2.3

Requirement

"Procurement documents shall require that the supplier have a documented quality assurance program that implements parts or all of ANSI N45.2 as well as applicable quality assurance program requirements of other nationally recognized codes and standards."

Exception/Interpretation

Refer to Item 2j

13c. Sec. 3.3(a)

Requirement

Reviews of procurement documents shall be performed prior to release for bid and contract award.

Exception/Interpretation

Documents may be released for bid or contract award before completing the necessary reviews. However, these reviews are completed before the item or service is put into service, or before work has progressed beyond the point where it would be impractical to reverse the action taken.

13d. Sec. 3.3(b)

Requirement

Review of changes to procurement documents shall be performed prior to release for bid and contract award.

Exception/Interpretation

This requirement applies only to quality related changes (i.e., changes to the procurement document provisions identified in ANSI N18.7, Section 5.2.13.1, Subitems 1 through 5). The timing of reviews will be the same as for review of the original procurement documents.

13e. Sec. 10.1

Requirement

"Where required by code, regulation, or contract requirement, documentary evidence that items conform to procurement documents shall be available at the nuclear power plant site prior to installation or use of such items, regardless of acceptance methods."

Exception/Interpretation

Refer to Item 2k.

Requirement

"Post-installation test requirements and acceptance documentation shall be mutually established by the purchaser and supplier."

Exception/Interpretation

In exercising its ultimate responsibility for its quality assurance program, AEPSC/I&M establishes post-installation test

requirements giving due consideration to supplier recommendations.

14. Reg. Guide 1.146/ANSI N45.2.23 and ANSI N45.2.2.12

14a. ANSI N45.2.23, Sec. 1.1

Requirement

This standard provides requirements and guidance for the qualification of audit team leaders, henceforth identified as "lead auditors."

14b. ANSI N45.2.12, Sec. 4.2.2

Requirement

A lead auditor shall be appointed team leader.

Exception/Interpretation

The AEPSC audit program is directed by the AEPSC director quality assurance and is administered by designated QA department section managers/supervisors who are certified lead auditors.

Audits are, in most cases, conducted by individual auditors, not by "audit teams." These auditors are certified in accordance with established procedures and are assigned by the responsible QA section manager/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 AEPSC 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 QA department section managers/supervisor, thereby meeting

the requirements of ANSI N45.2.23 relative to "lead auditors", and "audit team leaders."

15. ANSI N18.1

Section 4.2.2

Requirement

At the time of initial core loading or appointment to the active position the operations manager shall hold a senior reactor operator's license.

Exception/Interpretation

The requirement implies that only personnel which currently hold a senior reactor operator's license can be appointed as operations manager. I&M takes the position that the operations superintendent must hold or have held a senior operator license at Cook Nuclear Plant or a similar reactor; and one mid-level operations production supervisor shall hold a current senior operator license. This exception/interpretation is consistent with Technical Specification 6.2.2.h, previously approved by Nuclear Regulatory Commission.

