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SUBJECT: Forwards answer to questions in 970929 RAI & marked-up
 & revised pages to QAP description.

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October 29, 1997

AEP:NRC:0847AG

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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)
(TAC NOS. M95888 AND M95889)

Reference: Letter AEP:NRC:0847AE, Quality Assurance Program
Description (QAPD) Proposed Revision, dated
August 1, 1997

In your letter of September 29, 1997, we were requested to supply
additional information needed to resolve questions concerning the
QAPD for Cook Nuclear Plant units 1 and 2. These questions are
addressed in the attachments to this letter.

Attachment 1 provides our answer to your questions. Attachment 2
provides a marked-up version of the pages in question from our
previous submittal. Attachment 3 provides our revised QAPD pages
resolving your questions.

Sincerely,

A. E. Fitzpatrick

E. E. Fitzpatrick
Vice President

vlb

Attachments

cc: A. A. Blind
A. B. Beach
MDEQ - DW & RDP
NRC Resident Inspector
J. R. Padgett

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ATTACHMENT 1 TO AEP:NRC:0847AG

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)
(TAC NOS. M95888 and M95889)

NRC Question:

"Quality Assurance Program Description (QAPD) Operable Requirements

American Electric Power Company (AEP) is proposing a new QAPD Section 1.7.11.2.4 that states:

Technical Specification (TS) equipment can be considered operable prior to the satisfactory completion of tests when TS surveillance requirements provide an allowance of time to analyze test results.

AEP's justification of the new section states:

Clarification of equipment operability affected by TS testing. This proposed change would revise the QAPD to be consistent with the TSs (such as 4.7.5.1.c.3 and 4.7.6.1.b.4) that allow time for completion of laboratory analysis.

The TSs take precedence over the QAPD. The TSs give a definition of operability and this is where the clarification should be made. Why is the new operability statement necessary if the TSs already allow AEP to declare a system, structure, or component operable before test results are analyzed? Please explain where and why the current TSs are inconsistent with the current QAPD, if this is the case. If the current TSs are consistent with the current QAPD, then why is a new QAPD section needed?"

Response to NRC Question:

The quality assurance program description (QAPD), as written, could be interpreted in a way that does not allow time to analyze test results. Thus, the QAPD could be construed as more restrictive, hence inconsistent, with the technical specifications (T/Ss). By adding QAPD section 1.7.11.2.4 in the previous submittal, we intended to acknowledge that the T/Ss take precedence over the QAPD, and mitigate the potential to interpret the QAPD in a way that is more restrictive, hence inconsistent, with the T/Ss.

We now propose a change to section 1.7.11.2.3 that would resolve the potential for an inconsistent interpretation between the T/S and the QAPD. Section 1.7.11.2.4 is no longer proposed or needed.

ATTACHMENT 2 TO AEP:NRC:0847AG

CURRENT PAGES MARKED-UP TO REFLECT PROPOSED CHANGES
TO THE QAPD

July, 1997 Page Number	Proposed Change (s)
8th item 1.7-31	Responsibility for planning and directing engineering and technical studies, equipment performance and instrument and control maintenance has been reassigned to nuclear engineering-reference to page 1.7-27.
10th item 1.7-31	Responsibility for directing on-site fuel management, and core physics testing has been reassigned to nuclear engineering-reference to page 1.7-27.
1.7-33	Lists new business performance organization responsibilities reassigned from previous organizations.
1.7-34 Purchasing and Materials Management Department	Title change from vice president-purchasing and materials management to vice president-procurement and supply chain services.
1.7-46	Design change reviews and approvals are completed by appropriate cognizant personnel, management, and in accordance with technical specifications and regulatory requirements.
1.7-69; 1.7.9.2.2	Clarifying that certain engineering specifications are in the form of dedication plans. Also, clarifying who is responsible for preparation, review, and approval of welding, heat treating, and nondestructive requirements, respectively.
1.7-71; 1.7.9.2.3	Clarifying specific organizations responsible for welder qualifications.
1.7-73 1.7.10.2.1	"procedure which includes inspections"; added for clarification. "hold points are" added for clarification.
1.7-79 1.7.11.2.3 <u>1.7.11.2.4</u>	Clarification of equipment operability affected by technical specification testing. This proposed change would revise the QAPD to be consistent with technical specifications, (such as 4.7.5.1.e.3 and 4.7.6.1.b.4), that allow time for completion of laboratory analysis.

1.7.11.2.3

or as specified by the governing technical specification for the equipment addressed.

Testing is accomplished after installation, maintenance, or repair, by surveillance test procedures, or performance tests, which must be satisfactorily completed prior to determining the equipment is in an operable status, except

~~for Technical Specification equipment addressed in section 1.7.11.2.4 below.~~

All data resulting from these tests is retained at the Cook Nuclear Plant after review by appropriate management personnel.

~~1.7.11.2.4~~

~~Technical Specification equipment can be considered operable prior to the satisfactory completion of tests when Technical Specification surveillance requirements provide an allowance of time to analyse test results.~~

1.7.12 CONTROL OF MEASURING AND TEST EQUIPMENT

1.7.12.1 SCOPE

Measuring and testing equipment used in activities affecting the quality of safety-related structures, systems and components are properly identified, controlled, calibrated and adjusted at specified intervals to maintain accuracy within necessary limits.

1.7.12.2 IMPLEMENTATION

1.7.12.2.1

Established procedures and instructions are used for calibration and control of measuring and test equipment utilized in the measurement, inspection and monitoring of

ATTACHMENT 3 TO AEP:NRC:0847AG

PROPOSED CHANGES TO THE QAPD

July, 1997 Page Number	Proposed Change (s)
8th item 1.7-31	Responsibility for planning and directing engineering and technical studies, equipment performance and instrument and control maintenance has been reassigned to nuclear engineering-reference to page 1.7-27.
10th item 1.7-31	Responsibility for directing on-site fuel management, and core physics testing has been reassigned to nuclear engineering-reference to page 1.7-27.
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1.7-46	Design change reviews and approvals are completed by appropriate cognizant personnel, management, and in accordance with technical specifications and regulatory requirements.
1.7-69; 1.7.9.2.2	Clarifying that certain engineering specifications are in the form of dedication plans. Also, clarifying who is responsible for preparation, review, and approval of welding, heat treating, and nondestructive requirements, respectively.
1.7-71; 1.7.9.2.3	Clarifying specific organizations responsible for welder qualifications.
1.7-73 1.7.10.2.1	"procedure which includes inspections"; added for clarification. "hold points are" added for clarification.
1.7-79 1.7.11.2.3	Clarification of equipment operability affected by technical specification testing. This proposed change would revise the QAPD to be consistent with technical specifications.

1.7.11.2.3

Testing is accomplished after installation, maintenance, or repair, by surveillance test procedures, or performance tests, which must be satisfactorily completed prior to determining the equipment is in an operable status, or as specified by the governing technical specification for the equipment addressed. All data resulting from these tests is retained at the Cook Nuclear Plant after review by appropriate management personnel.

1.7.12 CONTROL OF MEASURING AND TEST EQUIPMENT

1.7.12.1 SCOPE

Measuring and testing equipment used in activities affecting the quality of safety-related structures, systems and components are properly identified, controlled, calibrated and adjusted at specified intervals to maintain accuracy within necessary limits.

1.7.12.2 IMPLEMENTATION

1.7.12.2.1

Established procedures and instructions are used for calibration and control of measuring and test equipment utilized in the measurement, inspection and monitoring of