INDIANA & MICHIGAN ELECTRIC COMPANY

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May 31, 1985
AEP:NRC:0847F

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
QUALITY ASSURANCE PROGRAM; REVIEW OF
CONDITION REPORTS

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

TO WHOM IT MAY CONERN:

This letter constitutes a request for change to the Updated Final Safety Analysis Report (FSAR) for the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. Specifically, it addresses a proposed change to Section 1.7, "Quality Assurance" relative to reviews of Condition Reports performed by the Plant Nuclear Safety Review Committee, the AEPSC Nuclear Operations Division and the Nuclear Safety and Design Review Committee.

This request is submitted to you in accordance with 10 CFR 50.54 because it may be perceived as a reduction in commitment. The revised program, as described in Attachment 1, will continue to satisfy the criteria of 10 CFR 50, Appendix B and provide for prompt attention to conditions adverse to safety by our plant and corporate safety review committees.

The present wording of the FSAR is provided in Attachment No. 2, and the proposed changes are provided in Attachment No. 3.

This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,

M. P. Alexich 9131
Vice President 5/31/85

MPA/rn

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
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Attachment No. 1 to AEP:NRC:0847F

Justification for the Proposed Changes

Background

The present wording of FSAR section 1.7.16.2.2 requires Plant Nuclear Safety Review Committee (PNSRC) review of the investigation and closeout of all Condition Reports that are generated, as well as independent evaluation by the AEPSC Nuclear Operations Division and the Nuclear Safety and Design Review Committee (NSDRC). As originally conceived and practiced, Condition Reports were limited primarily to events and circumstances involving safety-related equipment, systems, or events. Additionally, the D. C. Cook Technical Specifications (Section 6.5.1.6) require the PNSRC to review only those Condition Reports dealing with Technical Specification violations.

The number of Condition Reports generated in 1981 amounted to approximately 500 and averaged 415 per year for the period 1975-1981. In 1982 the Plant informally extended the applicability of Condition Reports to include any abnormal condition, whether safety-related or not. This has created a situation in which the PNSRC and NSDRC are required to dedicate an inordinate amount of time to reviewing these reports. In 1984 alone approximately 2700 were generated, the preponderance of which did not represent credible risks to public health and safety.

Proposal

We propose to modify the FSAR Section 1.7.16.2.2 to allow review of the investigation and closeout actions on Condition Reports by management other than the PNSRC. Should this review determine potential Technical Specification violations or adverse implications for public health and safety, the report will be forwarded to the PNSRC for their review. Only those Condition Reports reviewed by the PNSRC will be forwarded to the AEPSC Nuclear Operations Division and the NSDRC for an independent evaluation of the reported condition. QA review and audit oversight will be applied to ensure that this differentiation is being correctly applied. This change will help to ensure that those Condition Reports which legitimately require PNSRC and NSDRC review receive adequate attention.

Attachment 2 to AEP:NRC:0847F

Present Wording of FSAR Section 1.7.16.2.2

b) In accordance with established procedures for Condition Reports, Nonconformance Reports, Inspection Reports, and Audit Reports.

c) As required by NRC Letters, I.E. Bulletins, and Inspection Reports.

d) As required by 10CFR, Part 21 identified deficiencies.

Corrective measures include both corrective and preventive actions.

1.7.16.2.2

Condition Reports provide the mechanism for plant personnel to notify management of conditions adverse to quality. Investigations of reported conditions adverse to quality are assigned by management. The investigation report is used to identify the need for changes to instructions or procedures, the initiation of a design change to correct system or equipment deficiencies, or the initiation of job orders to correct minor deficiencies. Further, Condition Reports are used to identify those actions necessary to prevent recurrence of the reported condition. Condition Reports are also used to report violations to codes, regulations, and the Technical Specifications. Condition Reports are reviewed by the PNSRC for evaluation of actions taken to correct the deficiency and prevent repetition.

The AEPSC Nuclear Engineering Division and the Nuclear Safety and Design Review Committee (NSDRC) receive Condition Reports for an independent evaluation of the reported condition.

1.7.17 QUALITY ASSURANCE RECORDS

1.7.17.1 POLICY

Records that furnish evidence of activities affecting the quality of safety related structure, systems, and components are maintained.

Attachment 3 to AEP:NRC:0847F

Proposed Wording of FSAR Section 1.7.16.2.2

b) In accordance with established procedures for Condition Reports, Nonconformance Reports, Inspection Reports, and Audit Reports.

c) As required by NRC Letters, I.E. Bulletins, and Inspection Reports.

d) As required by 10 CFR, Part 21 identified deficiencies.

Corrective measures include both corrective and preventive actions.

1.7.16.2.2

Condition reports provide the mechanism for plant personnel to notify management of conditions adverse to quality. Investigations of reported conditions adverse to quality are assigned by management. The investigation report is used to identify the need for changes to instructions or procedures, the initiation of design changes or job orders to correct system or equipment deficiencies, or other appropriate corrective and preventive actions. Condition Reports are also used to report violations to codes, regulations, and the Technical Specifications. Condition Reports will be reviewed by the appropriate level of management personnel to assure that adequate corrective and/or preventive action has been taken. If their review should identify conditions involving Technical Specification violations, or which could have adverse implications for public health and safety, the report will be forwarded to the PNSRC for review.

The AEPSC Nuclear Operations Division and the Nuclear Safety and Design Review Committee (NSDRC) receive those Condition Reports reviewed by the PNSRC for an independent evaluation of the reported condition.

1.7.17 QUALITY ASSURANCE RECORDS

1.7.17.1 POLICY

Records that furnish evidence of activities affecting the quality of safety related structures, systems, and components are maintained.