

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8905230120 DOC. DATE: 89/05/09 NOTARIZED: NO DOCKET #
 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME AUTHOR AFFILIATION
 ALEXICH, M.P. Indiana Michigan Power Co. (formerly Indiana & Michigan Ele
 RECIP. NAME RECIPIENT AFFILIATION
 MURLEY, T.E. Document Control Branch (Document Control Desk)

SUBJECT: Requests change to QA program as described in updated FSAR
 to allow exception to biennial review of plant procedures.

DISTRIBUTION CODE: Q004D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6
 TITLE: QA Topical Report, Amendment, or Correspondence (Docket/Utility Speci

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AEP:NRC:0847P

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
REQUEST FOR CHANGE IN QUALITY ASSURANCE PROGRAM
10 CFR 50.54 AND UPDATE FSAR
BIENNIAL REVIEWS OF COOK NUCLEAR PLANT PROCEDURES

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

Attn: T. E. Murley

May 9, 1989

Dear Dr. Murley:

This letter constitutes a request for change to the Quality Assurance Program as described in the Donald C. Cook Nuclear Plant Updated (July 1988) Final Safety Analysis Report (UFSAR), Section 1.7, Appendix A, Item 5. Currently the UFSAR, by reference to ANSI N18.7, and the plant implementing procedure PMI-2010, Revision 15, require biennial review of procedures. We hereby request an exception to the biennial review of plant procedures based on the justification enclosed in Attachment 1. Attachment 2 contains the proposed change to the FSAR.

We believe this change does not involve a reduction in commitment. We will assume that this proposed change is acceptable 60 days from the date of this letter, unless informed otherwise, as provided by 10 CFR 50.54(a)(3)(iv). PMI-2010 will be revised immediately following approval and the change will be incorporated into the UFSAR by our normal UFSAR submittal.

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

Sincerely,

M. P. Alexich
Vice President

ldp
Attachments

Q004
1/1

8905230120 890509
PDR ADOCK 05000315
P PNU

Dr. T. E. Murley

-2-

AEP:NRC:0847P

cc: D. H. Williams, Jr.
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Charnoff
A. B. Davis
NRC Resident Inspector - Bridgman
G. Bruchmann

ATTACHMENT 1 TO AEP:NRC:0847P
JUSTIFICATION OF PROPOSED CHANGES

JUSTIFICATION FOR CHANGE

It is our belief that a dynamic process is necessary to maintain procedures in an accurate and useful condition. The static biennial review process specified by ANSI N18.7 is not responsive enough to meet our needs.

Over the past years, we have effected programmatic controls to ensure that potential procedural impact is assessed and revisions occur upon receipt of changes in source documents. Examples of these programmatic controls include the design change process, vendor manuals, Technical Specifications amendments, problem report and audit report preventive actions, and Corporate Engineering Specifications.

Although no system is infallible, our proposed alternative to the biennial review process is considered to be more timely and equally effective. Further, since substantive changes to plant procedures are now being made on an as-needed basis, the additional biennial review is redundant, has proven to be unnecessary and is a significant drain on plant resources without a commensurate improvement in plant safety.

ATTACHMENT 2 TO AEP:NRC:0847P

SUGGESTED FSAR WORDING

SUGGESTED FSAR WORDING

N18.7, Section 5.2.15 Page 1.7.B-106

Requirement

"Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable."

Exception/Interpretation

I&M has programmatic control requirements in place that make the biennial review process redundant from a regulatory perspective. These programmatic controls were effected in an effort to ensure that plant instructions and procedures are reviewed for possible revision when pertinent source material is revised, therefore maintaining the procedures current. We believe that this approach better addresses the intent of the biennial review process and is more acceptable from both a technical and a practical perspective than a static two-year review process.

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MA
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Sincerely,

A handwritten signature in dark ink, appearing to read 'M. P. Alexich', written over the typed name.

M. P. Alexich
Vice President

ldp
Attachments

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PDR ADOCK 05000315
P PNU

Q004
1/1

Dr. T. E. Murley

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