

CONFIRMATORY ACTION LETTER

NOV 17 1983

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Docket No. 50-315
Docket No. 50-316

Mr. John E. Dolan
Vice Chairman, Engineering and Construction
American Electric Power Service Corporation
1 Riverside Plaza
Columbus, OH 43216

Gentlemen:

This letter confirms the telephone conversation between Mr. J. F. Streeter of this office with Mr. M. Alexich and other members of your staff on November 16, 1983.

During a recent inspection at the D. C. Cook Nuclear Plant and the AEP Corporate Offices, it was determined that Nuclear Safety and Design Review Committee (NSDRC) reviews and audits and engineering design verification were not being conducted in accordance with applicable requirements. Further, our inspection determined that these conditions existed for some time which raises concerns regarding your ability to take timely and adequate corrective actions. To assure prompt and effective corrective actions are taken to correct these problems, we understand that the following will be developed, approved, and implemented by January 1, 1984:

A. NSDRC Audits (Technical Specification 6.5.2.8)

1. Plans and schedule for comprehensive, indepth audits of the conformance of facility operations to the Technical Specifications and applicable license conditions. The plans will include provisions for auditing each Technical Specification topic within each audit year and for auditing each Technical Specification line item within a specified period of time.
2. Plans and schedule for auditing compliance with each aspect of all 18 Criteria of Appendix B to 10 CFR Part 50 at least every 24 months, including both corporate and plant activities.
3. Procedures for assuring that audit reports are issued within 30 days of audit completion, that audit reports include an evaluation regarding the effectiveness of the Quality Assurance Program elements audited, and that Corrective Action Requests are returned to the issuer with adequate response, as defined in ANSI N45.2.12-1974, within 30 days of the issuance of the Corrective Action Requests.

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B. NSDRC Review (Technical Specification 6.5.2.7)

1. Plans, schedule and procedures for reviews of the NSDRC audit program. The reviews will be for status and adequacy of the audit program and the initial reviews will include the past audit program to determine appropriate remedial actions.
2. Plans, schedule, and approved procedures to assure NSDRC review of safety evaluations for (a) changes to procedures, equipment, or systems and (b) tests or experiments completed under the provisions of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question. The plans and schedule will include a historical review of previously completed safety evaluations to assure conditions do not exist which constitute an unreviewed safety question.
3. Plans, schedule, and procedures for NSDRC review of violations of codes, regulations, orders, Technical Specifications, license requirements, or internal procedures or instructions having nuclear safety significance. The plans and schedule will include a historical review to assure that conditions adverse to quality do not exist.
4. Plans, schedule and procedures for NSDRC review of the minutes of PNSRC meetings. The plans and schedule will include a historical review to assure conditions adverse to quality do not exist.

The NRC recognizes the necessity of using subcommittees to assist in the accomplishment of safety review committee review tasks. However, the determinations made by subcommittees must be approved by the NSDRC in session and documented in the NSDRC minutes. Delegation of reviews to a subcommittee does not relieve the NSDRC Committee members of their responsibility to maintain their cognizance of the delegated work activities.

C. Design Verification (Criterion III of Appendix B to 10 CFR Part 50 and ANSI N45.2.11-1974)

1. Design control procedures implementing the design verification requirements specified in ANSI N45.2.11-1974. The procedures will be part of the normal design control practice implemented by each engineering group performing design activities associated with the D. C. Cook Nuclear Plant.
2. Plans and schedule for review of all past design activities performed in conjunction with the D. C. Cook Nuclear Plant for which required design verification was not performed and documented.

We understand that by January 1, 1984, you will provide this office with a letter addressing your plans and schedule for completing your corrective actions as described above. Please let us know immediately if your understanding differs

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from that set forth above.

We will gladly discuss any questions you may have concerning these matters.

Sincerely,

Original signed by James G. Keppler

James G. Keppler
Regional Administrator

cc:

J. A. Axelrad, IE
W. G. Smith, Jr., Plant Manager
DMB/Document Control Desk(RIDS)
Resident Inspector, RIII
Ronald Callen, Michigan
Public Service Commission
EIS Coordinator, USEPA
Region 5 Office

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