

# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

July 10, 1986  
AEP:NRC:0990

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
NRC INSPECTION REPORT NOS. 50-315/86019 (DRS)  
AND 50-316/86019 (DRS)


Mr. James G. Keppler, Regional Director  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Keppler:

This letter is in response to Mr. J. J. Harrison's letter dated June 12, 1986, which forwarded the report on the safety inspection conducted by members of your staff. This inspection was conducted from April 21 through May 2, 1986 and May 12 through May 16, 1986 on activities at the D. C. Cook Nuclear Plant Units 1 and 2. The Notice of Violation attached to Mr. Harrison's letter identified four violations. Violations 1 through 3 are addressed in the attachment to this letter. Violation 4 required no response, because the inspection showed that corrective action had been taken to prevent recurrence.

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 *PBX*  
Vice President *7/10/86*

cm

Attachment

cc: John E. Dolan  
W. G. Smith, Jr. - Bridgman  
R. C. Callen  
G. Bruchmann  
G. Charnoff  
NRC Resident Inspector - Bridgman

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NRC VIOLATION NO. 1

"10 CFR 50, Appendix B, Criterion IV, as implemented by the D. C. Cook Operations Quality Assurance Program, requires that measures be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services.

Contrary to the above, Service Order Nos. 80138-040-6 and 80251-040-6 were classified as nonsafety-related although the orders were for safety-related services on the emergency diesel generators."

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

1. Procurement document classification will be in accordance with the guidelines given below, for services on safety-related systems and equipment.
  - a. If service personnel are to work essentially to their own procedures or are to supervise other service personnel, with minimal direction and/or overview by the plant and/or AEPSC, procurement document is to be classified QA-N.
  - b. If service personnel are to work to plant procedures and/or under the direct, continuous supervision of plant and/or AEPSC personnel, procurement document is to be classified QA-N-Commercial Grade.
  - c. Finally, if the service to be rendered is essentially labor, and/or is subject to supervision and review by plant and/or AEPSC personnel, the document is to be classified QA-S.
2. A note will be placed on all QA-N procurement documents for services:

"Supplier to furnish documentary evidence of the qualification and certification of service personnel."
3. The QA Manager will issue a memorandum to all Division Managers stating the new guidance and requirements.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATION

Previously described actions will prevent further violations.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All actions will be completed by September 30, 1986.



NRC VIOLATION NO. 2

"10 CFR 50, Appendix B, Criterion VII, as implemented by the D. C. Cook Operations Quality Assurance Program, requires that measures be established to provide for appropriate source evaluation and selection.

Contrary to the above, Service Order Nos. 80138-040-6 and 80251-040-6 and Purchase Order Nos. 72101-040-6X and 72296-040-5X were issued without the appropriate source evaluation and selection.

[Additional NRC Details:]

During discussions with licensee personnel, the inspector was informed that suppliers were considered qualified to supply parts for equipment which they had originally supplied. The inspector stated that ANSI N45.2.13 requires periodic evaluations of a supplier's performance to verify that procured items are continuously manufactured under an appropriate quality program and that adequate quality controls are maintained during manufacture and storage. No such verifications were evident.

These failures to ensure that source evaluation and selection is properly performed are in violation of 10 CFR 50, Appendix B, Criterion VII."

ACTIONS TAKEN AND RESULTS ACHIEVED

In support of our efforts to satisfy 10 CFR 50 Appendix B, Criterion VII and ANSI N45.2.13, we offer the following information:

- a. (Ref. Purchase Order Nos. 72101-040-6X and 72296-040-5X.) During routine supplier review and evaluation in May, 1985, Nuclear Energy Services (NES) was recertified on the Qualified Suppliers List. However, specific activities under purchase orders for nozzle dam assemblies resulted in downgrading of the suppliers to conditionally acceptable and a visit to the supplier facility.
- b. On September 10, 1985, an AEPSC audit was conducted at NES with specific emphasis on nozzle dam assemblies and how NES would control its subvendor, Presray. As a result of this audit AEPSC required NES to do more subvendor follow-up. All activities are summarized in the AEPSC QA files.
- c. In addition, AEPSC contacted the subvendor Presray directly and made a separate visit to their Pawling (New York) facility to generally examine the QA Program and repair activities. No action was required on the QSL, since Presray is not a direct supplier, but results of this activity are maintained in the AEPSC QA file.
- d. (Ref. Service Order Nos. 80138-040-6 and 80251-040-6.) In the matter of Dresser Industries, Worthington Compressor Division, we have done facility audits in May 1982 and May 1985. As a result of the May 1985 audit, we found it necessary to downgrade the supplier to conditionally acceptable when the company took the position that they were a commercial grade supplier. Activities with this vendor include

spares procurement, technical services, and repair of major items. Because this vendor has taken the above position, each activity requires a unique procurement agreement. AEPSC then provides surveillance, audit and such other support as required to assure the quality of the items or services furnished.

The foregoing steps, in addition to routine supplier review and evaluation, were taken in order to accomplish what AEPSC QA believed necessary to satisfy 10 CFR 50 Appendix B, Criterion VII and ANSI N45.2.13 in these specific cases. Results of these efforts are on file in the AEPSC Columbus (Ohio) office.

We respectfully request that this violation remain open pending further review of the information on file.

NRC VIOLATION NO. 3

"10 CFR 50, Appendix B, Criteria XIII, as implemented by the D. C. Cook Operations Quality Assurance Program, requires that measures be established to control the storage and preservation of material and equipment to prevent damage or deterioration.

Contrary to the above, water was dripping into certified storage areas "E" and "I" from leaks in the roof. These storage areas are indoor heated (Class B) storage areas. Several small pipe fittings stored in area "I" were noted to be wet and were beginning to rust. Identification tags for these parts were wet and were illegible."

CORRECTION ACTION TAKEN AND RESULTS ACHIEVED

Plastic covers were put in place to cover fittings while awaiting roof repairs. All identification tags were replaced with new tags. The roof was repaired by a contractor on May 22, 1986. A Job Order was written to clean the fittings that had rust on them and those fittings have been put on temporary hold, removed from the storage area and put in the "Hold" cage until the Job Order has been completed.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

A Department training program will be established detailing the individual's and the Department's responsibilities for reporting and/or correcting instances of material deficiencies. Emphasis will be placed on the necessity and means of compensatory interim action to be taken until corrective measures can be completed, and for elevating the priority of work requests on jobs where compensatory actions are not feasible. Also stressed will be the necessity of following up on corrective measures that have been requested to ensure their prompt and timely resolution.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Planning Department will have the program described above in effect on August 1, 1986.

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