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SUBJECT: Requests change to QA program as described in Jul 1986 updated FSAR. Change would allow condition repts to be segregated by significance. Approval by 861001 requested. Current & proposed updated FSAR & problem list encl.

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AUTH.NAME AUTHOR AFFILIATION
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Record Services Branch (Document Control Desk)

SUBJECT: Requests change to ISI program as described in Jul 1986 updated FSAR. Change would allow condition rept to be generated by significance. Approval by 861001 requested. Current & proposed updated FSAR & Attachment 1 encl.

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	PWR-A PSB	1	1	PWR-A RSB	1	1
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	NRR/ORAS	1	0	REG FILE 04	1	1
	RGN3	1	1			
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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

September 2, 1986
AEP:NRC:0847K

Donald C. Cook Nuclear Plant Unit Nos. 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 UPDATED FSAR
REVIEW OF CONDITION REPORTS

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

Dear Sirs:

This letter constitutes a request for change to the Quality Assurance Program as described in the Donald C. Cook Nuclear Plant Updated (July, 1986) Final Safety Analysis Report (UFSAR), Section 1.7.16.2.2. This request is submitted to you in accordance with 10 CFR 50.54(a)(3).

The current UFSAR (reference Attachment 1) could be interpreted to mean that all Condition Reports will be reviewed by the Plant Nuclear Safety Review Committee (PNSRC) and Nuclear Safety Design Review Committee (NSDRC). The PNSRC and NSDRC are the safety review groups addressed in our Technical Specifications. Condition Reports are used to document many concerns, both significant (e.g., violations) and nonsignificant (e.g., minor maintenance). The proposed change would permit the Condition Reports to be segregated by significance. The segregation would effectively reduce the number of condition reports reviewed by the PNSRC and NSDRC to those which only address significant conditions adverse to quality. This reduction in required reviews would provide management more time to spend on significant activities. Concurrently (commencing October 1, 1986), the new Corrective Action Plan (CAP) would assure adequate management attention to all concerns documented in Condition Reports.

The CAP has been discussed with Region III and NRR in meetings on April 30, 1986, May 8, 1986, and May 23, 1986. The CAP (1) defines those problems which shall be designated as significant and (2) provides examples of significant problems. Attachment 2 to this letter provides examples of those problems which will be treated as significant and thereby require review by the safety review groups.

Two additional features of the CAP which will assure adequate management attention of all problems (whether or not designated as significant) are:

(1) All problems documented on condition reports will be reviewed by a management group (Problem Assessment Group) within a few days after a report is generated to make assignments for resolution and confirm reportability obligations are being met.

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(2) Recurring problems will be addressed as an adverse trend which is considered significant. Significant problems will be reviewed by the PNSRC and NSDRC in accordance with the Technical Specification requirements.

We believe the CAP will be consistent with 10 CFR 50 Appendix B Criterion XVI, which states, in part "...The identification of the significant condition adverse to quality...shall be documented and reported to appropriate levels of management." The CAP clarifies how we will determine if an adverse condition is significant or not, and assures appropriate management attention.

Attachment 3 includes the proposed revisions to Section 1.7.16.2.2 of the July, 1986 UFSAR, which would effect this QA program change.

In addition, the current UFSAR discusses Noncompliance Reports (NCRs) which are used by AEPSC personnel and discusses reviews, initiated by the Nuclear Operations Division, of (plant) Condition Reports (CRs). Neither of these practices would continue or be needed as part of the new CAP. AEPSC personnel would be required to use a Condition Report rather than an NCR. AEPSC reviews of plant initiated CRs would be initiated, when needed, by the D. C. Cook Problem Assessment Group. The proposed UFSAR (Attachment 3) addresses these changes. These changes and other editorial changes to the UFSAR, resulting from the approval of this proposal, will be incorporated into the UFSAR by our normal UFSAR submittal.

We request your approval of this proposed change by October 1, 1986. As discussed in our previous meetings, October 1, 1986 is the target date for implementation of our Corrective Action Plan. Should you choose not to respond, we will assume that our proposed change is acceptable 60 days from the date of this letter as provided by 10 CFR 50.54(a)(3)(iv).

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
Vice President

MPA/cm

Attachment

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

UFSAR, Section 1.7.16.2.2 (July, 1986)

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 recurrence.

Noncompliance Reports (NCRs) provide the mechanism for AEPSC personnel to identify noncompliances. Investigation of reported conditions are assigned to the responsible individual. NCR investigation requires the determination of the cause of the condition and identification of immediate action and action taken to prevent recurrence.

The AEPSC Nuclear Operations Division receives copies of Condition Reports for distribution, on a selected basis, to cognizant engineering departments for review.

The AEPSC Nuclear Safety and Design Review Committee reviews Condition Reports, NCRs, NRC Inspection Report Responses, 10 CFR 21 items and QA and NSDRC audits for independent evaluation of the reported conditions and corrective actions.

The QA Department periodically audits the corrective action systems for compliance and effectiveness.

SIGNIFICANT* PROBLEMS REQUIRING PNSRC REVIEW

1. ALL NRC REPORTABLE EVENTS.

2. VIOLATIONS OF TECHNICAL SPECIFICATIONS, CODES, REGULATIONS, ORDERS, OR LICENSE REQUIREMENTS.
   A. ALL SIGNIFICANT VIOLATIONS OF THE FIRE PROTECTION PROGRAM.
   B. ALL SIGNIFICANT VIOLATIONS OF THE RADIATION PROTECTION PROGRAM
   C. ALL SIGNIFICANT VIOLATIONS OF THE RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM.
   D. ALL SIGNIFICANT VIOLATIONS OR REFUELING PROCEDURES.
   E. ALL RECOGNIZED INDICATIONS OF A SIGNIFICANT UNANTICIPATED DEFICIENCY IN SOME ASPECT OF DESIGN OR OPERATION OF SAFETY-RELATED STRUCTURES, SYSTEMS, OR COMPONENTS.

3. SIGNIFICANT VIOLATIONS OF THE SECURITY PLAN.

4. SIGNIFICANT VIOLATIONS OF THE EMERGENCY PLAN.

5. SIGNIFICANT VIOLATIONS OF THE PROCESS CONTROL PROGRAM.

6. SIGNIFICANT VIOLATIONS OF THE OFF-SITE DOSE CALCULATION MANUAL.

7. UNPLANNED AND/OR UNMONITORED RELEASES OF RADIOACTIVE MATERIAL TO THE ENVIRONS THAT EXCEED TECHNICAL SPECIFICATION CRITERIA.

8. SIGNIFICANT VIOLATIONS OF THE QA PROGRAM FOR EFFLUENT AND ENVIRONMENTAL MONITORING OR SIGNIFICANT VIOLATIONS OF APPENDIX B TECHNICAL SPECIFICATIONS.

9. SIGNIFICANT OPERATING ABNORMALITIES OR DEVIATIONS FROM NORMAL AND EXPECTED PERFORMANCE OF PLANT EQUIPMENT THAT AFFECT NUCLEAR SAFETY.

10. DEFICIENCIES IN ESTABLISHED TRAINING PROGRAMS SUCH THAT A SIGNIFICANT PROBLEM COULD OR DID OCCUR.

11. SIGNIFICANT DEVIATIONS FROM SAFETY-RELATED DESIGN DOCUMENTS (E.G., DRAWINGS).

12. NRC INSPECTION FINDINGS.

13. ADVERSE TRENDS--UNACCEPTABLE LIMITS WILL BE REACHED WITHOUT ACTION TAKEN.

* SIGNIFICANT IS DEFINED AS:

TO AFFECT THE RESULTS OF IMPLEMENTED PROCEDURES, PLANT OPERATIONS, OR PLANT EQUIPMENT TO THE EXTENT THAT:

(1) A VIOLATION OF THE PLANT LICENSE (INCLUDING TECHNICAL SPECIFICATIONS) OR REGULATORY REQUIREMENT (10 CFR) OCCURRED OR WOULD HAVE RESULTED;
(2) THE ACTUAL PLANT STATUS OR CONFIGURATION WAS DIFFERENT THAN THAT WHICH WOULD HAVE RESULTED WITHOUT THE PROBLEM; OR
(3) THE ACTIONS OR EVENTS SPECIFIED BY THE PROTECTIVE PROGRAMS LISTED IN SECTION 6.8 OF THE TECHNICAL SPECIFICATIONS WERE NOT OR WOULD NOT HAVE BEEN ACCOMPLISHED.

UFSAR Section 1.7.16.2.2 (Proposed)

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

The AEPSC Nuclear Safety and Design Review Committee is responsible for assuring that independent reviews of violations (as specified in the Technical Specifications) are performed. These violations are considered significant problems which are documented on Condition/Problem Reports. The reviews will provide an independent evaluation of the reported problems and corrective actions.

The QA Department periodically audits the corrective action systems for compliance and effectiveness.