

INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

January 20, 1984

AEP:NRC:0858

Donald C. Cook Nuclear Plant
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NRC Confirmatory Action Letter of November 17, 1983

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

Dear Mr. Keppler:

This letter and its attachment responds to your Confirmatory Action Letter dated November 17, 1983.

The actions contained in our response will be incorporated into our Regulatory Performance Improvement Program (RPIP) and tracked under the management system being established to ensure satisfactory completion of our RPIP.

Although the NSDRC Subcommittee Chairmen and various key members of the NSDRC have reviewed the information contained in this letter individually, the NSDRC has not yet reviewed the entire contents of this letter while meeting in concert. The NSDRC will review this letter at its next scheduled meeting.

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

Very truly yours,


M. P. Alexich
Vice President

MPA/th

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

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INTRODUCTION

The following is a description of the changes that will be made in AEPSC committee activities and programs to be implemented in response to the November 17, 1983 Confirmatory Action Letter.

GENERAL

The AEPSC Nuclear Safety Design Review Committee (NSDRC) and NSDRC Subcommittee charters and procedures have been or are currently being revised to ensure that all commitments and requirements will be met. The revised charters and/or procedures will set forth in part:

- the responsibilities of each committee
- the committee membership
- how the committee will conduct their business
- that committee meeting minutes will be generated and that minority opinions will be documented in these minutes.
- that committee meeting minutes and reports will be distributed to all NSDRC members and alternates.
- the review and approval process for committee minutes and reports.
- committees membership training
- maintenance and management of committee records.

The schedule for charter and procedure revision is as follows:

NSDRC Charter - Revision 0 approved 1/10/84*
NSDRC Procedures - approved 1/10/84
Subcommittee Charters - approved 1/10/84
Subcommittee Procedures - 3/31/84

All historical reviews described herein, will be conducted utilizing the described upgraded or new procedures.

*NSDRC Charter has been incorporated into the NSDRC Procedures Manual. Revision 8 of the old charter is now designated as Revision 0.

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."

Effective January 1, 1984, the AEPSC QA Department, at the direction of the AEPSC Nuclear Safety and Design Review Committee (NSDRC), will initiate a program to audit facility conformance to Technical Specifications. This program will be comprised of two parts; (1) verification that Technical Specification surveillance requirements and license conditions are being met and (2) verification that Limiting Conditions for operation (LCO) are being met and that the Action Statement is complied with. Appendix A1 hereto provides a description of this program and a schedule for implementation.

For the surveillance verification portion, the program will audit each section of the Technical Specifications for each unit twice per year on a sampling basis. Each audit will focus on a different surveillance requirement and its associated procedure(s).

The verification of compliance with LCOs will be accomplished by review of daily control room logs with the auditor noting any action statement entries. Depending upon the number of action statement entries all or, a significant sample, will be audited for Action Statement compliance.

The NSDRC Audit Subcommittee will review and the NSDRC will approve the audit plans for this program. The Subcommittee will review the resulting audit reports and will report those items deemed to have significant importance to plant safety to the full NSDRC. The subcommittee will utilize this program for its audits focusing on areas that appear to have problems as determined by this program.

The AEPSC QA Department will develop a plan to ensure that applicable license conditions are audited either as part of the NSDRC or AEPSC QA audit programs. A complete review of the Cook Plant licenses has been initiated by AEPSC QA to; (1) confirm the applicable license conditions, (2) determine whether these conditions are currently being audited and by whom, and (3) generate revisions to audit schedules to accommodate those conditions not currently being audited. This effort will be completed by April 15, 1984 and the results communicated to the NRC by May 1, 1984 as an update to our R.P.I.P.

2. "Plans and schedule for auditing compliance with each aspect of all 18 criterion of Appendix B to 10CFR Part 50 at least every 24 months including both corporate and plant activities."

The Plant and AEPSC QA programs are audited on a 24 month cycle by the AEPSC QA Department. The audit reports resulting from these audits are reviewed by the NSDRC Subcommittee on Audits and significant findings are reported to the full NSDRC. The overall audit schedules for AEPSC QA Department audits will be reviewed and approved by the NSDRC. Appendix A2 hereto are the 1984-85 audit schedules for the AEPSC QA Department.

Review of audit results provides the initial determination of (a) adequate scope, (b) adequate audit process, and (c) program effectiveness from which the NSDRC can identify those areas requiring audit, reaudit or other forms of followup action. Those areas which appear to require most attention will be the subject of the NSDRC 24 month audits. Criteria examined by the NSDRC audits may vary and may not necessarily include all 18 Appendix B criteria on each audit.

However, each of the 18 criteria will have been reviewed for (a) (b) and (c) above by virtue of the AEPSC QA audit program. The evaluation of adequacy/effectiveness is a primary purpose of audit review by the NSDRC, and is considered prudent to take the results of the QA audits on Plant and Service Corporation activities into account when assessing both plant and corporate QA programs. Furthermore, these QA audits are an ongoing activity as is the NSDRC review process.

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."

All 1984 and subsequent NSDRC audits will be developed and administered by the AEPSC QA Department (QA) under the cognizance of the NSDRC and its Subcommittee on Audits. The conduct of these audits will be governed by the revised Subcommittee procedures and existing QA and AEPSC General Procedures. These require the completion and issuance of audit reports within 30 days, the issuance of Corrective Action Requests (CAR) within 14 days of the post audit conference and the response to CARs within 30 days of issuance. In addition, the CAR response due date and the disposition due date of any commitments made in response to a CAR will be entered into and tracked by the computerized commitment list in accordance with existing procedures.

Furthermore, the Subcommittee Secretary is required to follow-up on the timeliness of each audit and to report regularly to the Subcommittee on the overall progress of the NSDRC audit program.

NSDRC audits will be conducted in accordance with QA procedures which require an evaluation regarding the effectiveness of the QA program elements audited in the broader aspect of safe plant operation, of which QA is an integral part. The Subcommittee will ensure continued compliance regarding the "Effectiveness Statement".

AEP:NRC:0858

APPENDIX A1
TO SECTION A.1

NSDRC Audits of Facility
Conformance to Technical
Specification and License Condition

Program and Schedule

DONALD C. COOK NUCLEAR PLANT
QUALITY ASSURANCE DEPARTMENT

TITLE: VERIFICATION OF COMPLIANCE TO TECHNICAL SPECIFICATION REQUIREMENTS AND LIMITING CONDITIONS FOR OPERATION (LCO's)

1.0 OBJECTIVE

- 1.1 To provide verification that surveillance requirements for Technical Specifications comply with Specifications 1.0 through 6.0.

2.0 BACKGROUND

- 2.1 Unit One Technical Specifications.
2.2 Unit Two Technical Specifications.
2.3 PMI-4030, Surveillance Testing.
2.4 QAP-19, Supplement No. 3.

3.0 DETAILS TECHNICAL SPECIFICATIONS 3.02, 4.02, and 4.03

- 3.1.1 Technical Specification Surveillances will be verified with respect to compliance to frequency, test parameters and acceptance criteria. A detailed review of the Unit One and Unit Two Technical Specifications has determined there is a total number of 1,476 Technical Specification Surveillances.

- 3.1.2 A schedule (Attachment No. 1) has been developed to verify, in detail, a representative sample of the total number of Unit One and Unit Two Technical Specification Surveillances. (1,476) The schedule has been developed such that one surveillance is verified each week. The Technical Specification Surveillance will be alternated by unit to allow for each verification in both Units One and Two. The representative sample size based on a two year cycle (104 weeks) was calculated as follows:

Surveillance Scheduled for Verification	- 104	- 0.0705	= 7.05%
Total Number of Surveillances	1,476		

- 3.1.3 The Compliance Verification Form, Attachment No. 2, will be used to document the verification process for Technical Specification Surveillance. This Compliance Verification Form will be filled out for each surveillance verified based on the schedule provided in Attachment No. 1.
- 3.1.4 The Compliance Verification Form provides identification of the surveillance based on Technical Specification Paragraph Number, Unit associated, frequency, and responsible department. The form requires the review of the implementing procedure for Technical Specification Paragraph, frequency, test parameters and acceptance criteria. All of the above elements are justified through additional comments if it is determined that the adequacy within the procedure is unacceptable.

3.1.5 The verification will examine the last four completed tests based on completion dates, condition reports (if applicable) and test results. The time in days between the test completion dates is determined and addressed against the limit of 25% extension time which is permitted by Technical Specification 4.0.2.

3.1.6 This Technical Specification Surveillance compliance verification process will involve each of the following departments proportionally:

1. Technical (Engineering/C&I)
2. Technical (Chemical/R.P.)
3. Operations
4. Maintenance
5. Quality Control

3.1.7 This process will verify that adequate Technical Specification Surveillance compliance has been achieved in approved procedures and by Plant action for the representative sample of surveillances. Following the initial two year cycle, the next two year cycle will generate another schedule to verify Technical Specification Surveillances for each department still based on the sample size of 7.05% of the total and will verify different surveillances than those checked in the previous two year cycle. A master list will be kept up to date of the 1476 Technical Specification Surveillances that have been schedule for verification.

3.2 Quarterly (Limiting Conditions for Operation)

3.2.1 An in depth review of the Daily Control Room Logs for both Unit One and Two will be conducted. The auditor will document every log entry that indicates that entry was made into a "Technical Specification Action Statement" as set forth under a specific "Limiting Condition for Operation". This documentation will be in a controlled Q. A. Log book with the following data for each entry:

1. Unit affected
2. Time of event.
3. Date of event.
4. Identification of the Technical Specification number and the specific action statement that was entered.
5. Operational Mode Unit was in

3.2.2 The word "action" as defined by Technical Specifications, shall be those additional requirements specified as corollary statements to each principle specification which are part of the specifications. The criteria for action statement compliance to the specifications is stated in Technical Specification 3.0.2.

3.2.3 Once per quarter a representative sample based on the total number of events documented within the Q. A. Log book will be determined utilizing QAP-19, Supplement No. 3 for sample size.

3.2.4 The representative sample of events for the quarter will be verified for adequate compliance to the action statement requirement(s) for the applicable power operational mode in which the event occurred. This review process will be documented on Attachment No. 4, "Power Operation Under an Action Statement Requirement".

4.0 TECHNICAL SPECIFICATIONS 1.0, 2.0, 5.0, and 6.0

4.1 T/S 1.0 - "Definitions" - there are no auditable attributes in this section.

4.2 T/S 2.0 - Will be covered by QA's review of procedures and the biennial departmental procedure reviews.

4.3 T/S 4.01 through 4.04 will be factored into the audit programs described herein.

T/S 4.05 is audited under the current QA audit program.

4.4 T/S 5.0 - Auditable attributes will be audited under the QA audit program.

4.5 T/A 6.0 - With the exception of 6.5.2, all auditable attributes will be audited under the QA audit program. Audits of 6.5.2 will be conducted under the cognizance of the NSDRC.

5.0 REPORTING/MANAGEMENT REVIEW

5.1 The completed verification forms will be signed by the auditor(s) performing the task(s) and approved by the AEPSC Q. A. Supervisor. The AEPSC Q. A. Supervisor maintains the responsibility for assigning and assessing all corrective action pertaining to these reviews and the processing of completed review forms. The completed forms will be sent to the Plant Manager for information or action, as appropriate. Copies of the completed forms will be provided to The AEPSC Q. A. Manager, Chairman of Nuclear Safety and Design Review Subcommittee on Audits, Appropriate Assistant Plant Manager and Appropriate Plant Department Supervisor(s).



ATTACHMENT NO. 1

<u>YEAR: 1984</u>	<u>UNIT NO.</u>	<u>DEPARTMENT</u>	<u>SURVEILLANCE</u>	<u>S/R NO.</u>
September 3, 1984	2	Operations	4.5.1a2	
10, 1984	1	Performance	4.6.1.3b	
17, 1984	2	Operations	4.6.1.5.1a and 4.1.2.3.1	
24, 1984	1	C & I	4.6.4.2b1	
October 1, 1984	2	Chemical	(T)4.3-9, (1)#38 (Ch. Ck.)	
8, 1984	1	Maintenance	4.7.9.1.2c1	
15, 1984	2	Nuclear	4.1.1.1.1d	
22, 1984	1	Operations	4.5.4.1a	
29, 1984	2	Performance	4.7.9.4b1	
November 5, 1984	1	Operations	4.6.1.1a2	
12, 1984	2	C & I	(T)4.3-1, (1)#22 (Ch. Fun.)	
19, 1984	1	Operations	4.6.5.3.1a	
26, 1984	2	Nuclear	4.1.1.4a	
December 3, 1984	1	Environmental	(T)3.12-1, (1)#4B	
10, 1984	2	Q.C.	4.3.4.1.2d	
17, 1984	1	Maintenance	4.7.9.2b2	
24, 1984	2	C & I	(T)4.3-3, (1)#1A (Ch. Fun.)	
31, 1984	1	Operations	4.7.1.3.2 and 4.1.2.5d	

<u>YEAR: 1985</u>	<u>UNIT NO.</u>	<u>DEPARTMENT</u>	<u>SURVEILLANCE</u>	<u>S/R NO.</u>
January 7, 1985	2	Performance	4.5.2.e1	
14, 1985	1	Operations	4.8.2.3.1	
21, 1985	2	C & I	(T)4.3-8, (1)#1C (Ch. Fun.)	
28, 1985	1	R/P	(T)4.3-9, (1)#2A (Ch. Cal.)	
February 4, 1985	2	Operations	4.7.1.2a4	
11, 1985	1	Performance	4.7.3.1b2	
18, 1985	2	Maintenance	4.6.5.9a	
25, 1985	1	Nuclear	(T)4.3-1, (1)#2M (3) (Ch. Cal.)	
March 4, 1985	2	Operations	4.7.9.3a and 4.9.8	
11, 1985	1	Performance	4.6.2.2d	
18, 1985	2	Operations	(T)4.3-1, (1)#12 (Ch. Ck.)	
25, 1985	1	Chemical	4.4.7	

<u>YEAR: 1985</u>	<u>UNIT NO.</u>	<u>DEPARTMENT</u>	<u>SURVEILLANCE</u>	<u>S/R NO.</u>
October 7, 1985	1	Performance	4.8.1.1.2b6	
14, 1985	2	Chemical	4.11.2.5 and 4.1.2.7a1	
21, 1985	1	Operations	(T)4.3-6, (I)85 (Ch. Ck.)	
28, 1985	2	C & I	(T)4.3-10, (I)86 (Ch. Ck.)	
November 4, 1985	1	Nuclear	4.1.1.4.2b	
11, 1985	2	Operations	4.8.1.1.2a4	
18, 1985	1	Maintenance	(T)4.3-7, (I)813 (Ch. Cal.)	
25, 1985	2	Q.C.	4.4.10.1	
December 2, 1985	1	C & I	(T)4.3-4, (I)81A1 (Ch. Fun.)	
9, 1985	2	Operations	(T)4.3-10, (I)81 (Ch. Ck.)	
16, 1985	1	C & I	(T)4.3-6, (I)84 (Ch. Cal.)	
23, 1985	2	Operations	(T)4.3-10, (I)84 (Ch. Ck.)	

ATTACHMENT NO. 1

<u>YEAR: 1985</u>	<u>UNIT NO.</u>	<u>DEPARTMENT</u>	<u>SURVEILLANCE</u>	<u>S/R NO.</u>
April 1, 1985	2	Performance	4.5.2g2	
8, 1985	1	Operations	(T)4.3-1, (I)#14 (Ch. Ck.)	
15, 1985	2	C & I	(T)4.3-10, (I)#9 (Ch. Cal.)	
22, 1985	1	Performance	4.6.5.4c	
29, 1985	2	Maintenance	4.7.7.1c	
May 6, 1985	1	C & I	4.4.11.1a	
13, 1985	2	Operations	(T)4.3-2, (I)#1E (Ch. Ck.)	
20, 1985	1	R/P	4.7.7.1.2a2	
27, 1985	2	Performance	4.6.1.6	
June 3, 1985	1	Q.C.	4.4.5.1	
10, 1985	2	C & I	(T)4.3-1, (I)#4 (Ch. Fun.)	
17, 1985	1	Operations	(T)4.3-2, (I)#3B3 (Ch. Ck.)	
24, 1985	2	Performance	4.6.2.1d	
July 1, 1985	1	C & I	(T)4.3-2, (I)#2c (Ch. Fun.)	
8, 1985	2	Operations	(T)4.3-6, (I)#4 (Ch. Ck.)	
15, 1985	1	Maintenance	4.8.2.3.2a2 and 4.9.6.1	
22, 1985	2	Performance	4.6.5.1b2	
29, 1985	1	Environmental	4.11.1.2	
August 5, 1985	2	C & I	(T)4.3-2, (I)#3B1 (Ch. Fun.)	
12, 1985	1	Operations	(T)4.3-5, (I)#3B (Ch. Ck.)	
19, 1985	2	Performance	4.7.5.1c1	
26, 1985	1	Operations	(T)4.3-7, (I)#10 (Ch. Ck.)	
September 2, 1985	2	C & I	(T)4.3-2, (I)#8A (Ch. Fun.)	
9, 1985	1	Operations	(T)4.3-6, (I)#2 (Ch. Ck.)	
16, 1985	2	Performance	4.7.6.1d1	
23, 1985	1	Maintenance	4.8.2.5.2c1	
30, 1985	2	Operations	(T)4.3-8, (I)#4B (Ch. Ck.)	

**TECHNICAL SPECIFICATION COMPLIANCE
SURVEILLANCE SCHEDULE**

<u>YEAR: 1984</u>	<u>UNIT NO.</u>	<u>DEPARTMENT</u>	<u>SURVEILLANCE</u>	<u>S/R NO.</u>
January 2, 1984	1	Chemical	4.1.2.8a1	
9, 1984	2	Nuclear	4.2.3.2b	
16, 1984	1	Operations	4.1.1.1.1b	
23, 1984	2	Performance	4.7.9.2c	
30, 1984	1	Operations	4.1.1.3a	
February 6, 1984	2	C & I	4.3.3.8.1	
13, 1984	1	Operations	4.1.1.5b	
20, 1984	2	R/P	(T)4.3-3, (I)#1A (Ch. Cal.)	
27, 1984	1	Nuclear	4.1.1.1.2	
March 5, 1984	2	Maintenance	4.4.9.1.2	
12, 1984	1	Performance	(T)4.3-7, (I)#14 (Ch. Ck.)	
19, 1984	2	Operations	4.1.3.1.1	
26, 1984	1	C & I	(T)4.3-1, (I)#13 (Ch. Cal.) and 4.4.9.3.1A	
April 2, 1984	2	Operations	4.2.5 and 4.8.2.2	
9, 1984	1	Performance	4.5.1d	
16, 1984	2	Environmental	4.11.2.4	
23, 1984	1	Operations	4.2.1.1a1	
30, 1984	2	Performance	4.7.9.3b1	
May 7, 1984	1	Operations	4.4.4.2	
14, 1984	2	Maintenance	4.5.2.d2	
21, 1984	1	C & I	(T)4.3-9, (I)#3a (Ch. Fun.)	
28, 1984	2	Operations	4.3.4.1.2b	
June 4, 1984	1	Performance	4.2.5.2	
11, 1984	2	R/P	4.12.2	
18, 1984	1	Q.C.	4.7.10a	
25, 1984	2	C & I	4.4.11.1b	
July 2, 1984	1	Operations	4.5.2b1 and 4.4.9.3.1C	
9, 1984	2	Performance	(T)4.3-2, (I)#7b (Ch. Cal.)	
16, 1984	1	C & I	4.4.6.1c	
23, 1984	2	Maintenance	4.6.4.2b2	
30, 1984	1	Nuclear	4.2.3.1b	
August 6, 1984	2	Environmental	4.11.3.1b	
13, 1984	1	Performance	4.4.11.3	
20, 1984	2	Operations	4.4.11.2	
27, 1984	1	C & I	4.5.2c1	

☐ Unit One

☐ Unit Two

Tech. Spec. Paragraph No.: _____ Amendment No.: _____

Required Frequency: _____

Test Parameters: _____

Acceptance Criteria: _____

Responsible Department: _____

Implementing Procedure No.: _____ Rev. No.: _____

Review the procedure and verify that the following elements are adequately addressed:

Tech. Spec. Paragraph: ☒ Acceptable ☐ Unacceptable

Frequency: ☒ Acceptable ☐ Unacceptable

Test Parameters: ☒ Acceptable ☐ Unacceptable

Acceptance Criteria: ☒ Acceptable ☐ Unacceptable

Justify all elements which were rated as unacceptable: _____

☐ Attached Page

Review the last four (4) completed tests and provide the following information (list test dates from most current to oldest):

Test Completion Date

Test Results

***Condition Report**

1. _____ ☐ Acceptable ☐ Unacceptable C/R #: _____

2. ☐ Acceptable ☐ Unacceptable C/R #: _____

3. ☐ Acceptable ☐ Unacceptable C/R #:

4. ☐ Acceptable ☐ Unacceptable C/R #:

* Enter the Condition Report number which was generated for each unacceptable test.
If any Condition Report was not classified as a reportable occurrence, justify below:

Utilizing the required test frequency and the four (4) test completion dates previously obtained, complete the following:

Required Test Frequency (in days) _____ x 25% = days.

Difference in Time (days) in Excess of the Test Frequency:

Between Test No.. 1 and No. 2: _____ days.

Between Test No. 2 and No. 3: _____ days.

Between Test No. 3 and No. 4: days.

Add the Total Time (days) Between Test: _____ days.

Compare each of the above figures to the number identified in the box. If any figure exceeds the number identified in the box, determine if the responsible department has previously written a Condition Report. If one has not been written, generate one.

☐ Condition Report Required ☐ Not Required

If required: Condition Report Number: _____

General Comments: _____

Performed By: _____ Date: _____

Approved By: _____ Date: _____

AEPSC Q.A. SUPERVISOR

AEPSQ Q.A. SUPERVISOR



AEP:NRC:0858

APPENDIX A.2
TO SECTION A.2

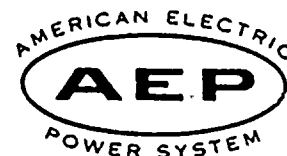
AEPSQ QA Department

Audit Schedules

1984-85

[illegible]

AMERICAN ELECTRIC POWER SERVICE CORPORATION



DATE: December 21, 1983
QA-12-83-C01756
SUBJECT: AEPSC QA INTERNAL AUDIT PROGRAM
SCHEDULE 1984/85

FROM: M.F. Scaramellino


TO: ~~R.F. Kroeger~~ *12/21/83*

Attached is the AEPSC Quality Assurance Master Internal Audit Schedule for 1984/85.

The schedule is designed to perform the audit required by Criterion 18 of 10CFR50, Appendix B. Each applicable Criterion of 10CFR50, Appendix B will be audited at least once over the two year audit cycle.

It is to be understood that some audits will be cancelled during the implementation of this audit schedule as the Criterion scheduled for audit may not be applicable to the Auditee. Cancellation of a scheduled audit will be based upon a review by the AEPSC QA Department which verifies that the Criterion is, in fact, not applicable to the Auditee.

Please contact me should you have any questions regarding this audit schedule.


M.F. Scaramellino
Internal Audit Coordinator

jb



AEPSC QUALITY ASSURANCE MASTER INTERNAL AUDIT SCHEDULE 1984/85

(AEPSC CORPORATE OFFICES)

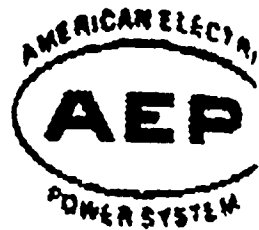
AEPSC Division/Section	1984			1985		
	Criteria 1 & 2	Criteria 3 & 8	Criteria 4 & 7	Criteria 5, 6, 17	Criteria 9-15	Criteria 16 & 18
Design Division	April	July	Oct.	April	July	Oct.
-Architectural/Structural	"	"	"	"	"	"
-Electrical Plant	"	"	"	"	"	"
-Mechanical	"	"	"	"	"	"
-Control Services	"	"	"	"	"	"
Mechanical Engineering Div.	"	"	"	"	"	"
-Steam Gen.	"	"	"	"	"	"
-HVAC/Fire Protection	"	"	"	"	"	"
-Chemical	"	"	"	"	"	"
-Heaters & Pumps	"	"	"	"	"	"
-Instrument & Control	May	Aug.	Nov.	May	Aug.	Nov.
-Piping & Valves	"	"	"	"	"	"
-Turbine	"	"	"	"	"	"
-Metallurgy	"	"	"	"	"	"
-R & D/Analytical	"	"	"	"	"	"
Electrical Engineering Div.	"	"	"	"	"	"
-Electrical Gen.	"	"	"	"	"	"
Nuclear Engineering Div.	"	"	"	"	"	"
-NM & FM	"	"	"	"	"	"
-NS & L	"	"	"	"	"	"
-Nuclear Operations	June	Sept.	Dec.	June	Sept.	Dec.
-Rad. Support	"	"	"	"	"	"
Civil Engineering Div.	"	"	"	"	"	"
-Structural Engineering	"	"	"	"	"	"
-Civil Engineering Lab.	"	"	"	"	"	"
Materials Handling Div.	"	"	"	"	"	"
Purchasing Division	"	"	"	"	"	"
-AEPSC	"	"	"	"	"	"
-I & MECo.	"	"	"	"	"	"

[Signature]
AEPSC Section Manager, Audits & Procurements

[Signature] 12/21/83
AEPSC Manager of Quality Assurance

[Signature] 12/22/83
AEPSC - NSDRC

AMERICAN ELECTRIC POWER SERVICE CORPORATION



DATE: December 21, 1983
SUBJECT: 1984/85 Audit Schedule


FROM: T.P. Beilman

TO: ~~R.F. Kroeger~~ *R.F. Kroeger 12/21/83*

Based upon the number of Plant Manager Instructions presently under revision and those scheduled for revision during 1984, frequent changes will be necessary to the audit schedule.

It is requested that I be given the flexibility to revise the audit schedule as needed so that we can be responsive to these PMI changes. Any changes that I make would result in a revised schedule which could be transmitted to you with my justification for the change.

Please advise if this is an acceptable approach.


T.P. Beilman

/sks

cc: File

1984/85 AUDIT SCHEDULE

Reviewed By: MA 12/4/83 Date
Approved By: PP 12/14/83 Date

NSDRC: MA 12/30/83

1984

MONTH	AUDIT SUBJECT	AUDITOR	AUDIT NO.
January	PMI-4060		
	PMI-2271		
	PMI-2260		
February	PMI-3120		
	PMI-4050		
	PMI-5040		
March	PMI-7080		
	PMI-5060		
	PMI-2010		
April	PMI-2270		
	PMI-6030		
	PMI-5031		
May	PMI-4030		
	PMI-5020		
	Canonie		
June	NRC Commitments		
	PMI-2110		
	PMI-2220		
July	L.K. Comstock		
	PMI-7030		
	PMI-2140		
August	PMI-1030		
	PMI-2130		
	PMI-5080		
September	PMI-3010/7040		
	PMI-2070		
	PMI-2100		
October	Power Systems, Inc.		
	PMI-2290		
	PMI-2080		
November	NRC Commitments		
	PMI-2272		
	PMI-5050		
December			

1985

Reviewed By: WJ 12/21/83 Dat
 Approved By: WJ 12/21/83 Dat
 NSDRC: WJ 12/30/83

MONTH	AUDIT SUBJECT	AUDITOR	AUDIT NO.
January	PMI-6040		
	PMI-2090		
	PMI-1010		
February	Dayco		
	PMI-2030		
	PMI-7070		
March	PMI-1040		
	PMI-2160		
	PMI-2210		
April	PMI-4030		
	PMI-2060		
	PMI-5075		
May	NRC Commitments		
	PMI-3130		
	PMI-6020		
June	Manta		
	PMI-2040		
	PMI-4020		
July	PMI-2275		
	PMI-5090		
	PMI-3150		
August	PMI-5070		
	PMI-6010		
	PMI-4040		
September	PMI-5100		
	PMI-5045		
	PMI-2310		
October	I.C.M.S.		
	PMI-5030		
November	NRC Commitments		
December			

NSDRC Reviews (Technical Specification 6.5.2.7)

- B.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".

The charter for the Subcommittee on Audits has been extensively revised to define expanded responsibilities and contains the following significant features:

-NSDRC Audits of facility and committee activities to be performed by the AEPSC QA Division under the cognizance of the NSDRC.

-Audit teams will be comprised of a fully qualified Lead Auditor and usually include a regular or alternative member of the NSDRC as Audit Team Leader.

-The requirements for independent reviews of NSDRC Audit Reports, the QA Program and QA Audit Reports.

The procedures for the Subcommittee on Audits have been completely rewritten to strengthen the NSDRC audit program and to formalize the Subcommittee's expanded review functions and to institute reporting of audit findings and results of independent reviews to the NSDRC. Significant features of the new procedures are as follows:

-Definition of the interface and delineation of the responsibilities for the conduct of NSDRC Audits between the AEPSC QA Department and the Subcommittee.

-Detailed methods for the review and analysis of each NSDRC audit report for scope and depth of audits, and for the review of NSDRC audit reports for trends detrimental to quality and implications of findings to establish the status and adequacy of the NSDRC Audit Program.

-Detailed instructions for the independent review each six months, of the QA audit program and of QA audit reports for significant findings in order to ensure adequacy and status of the QA Audit Program.

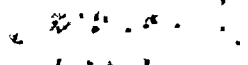
Described below are some of the new review functions and the dates when instituted: -

-Since January 1982, audit team leaders have been supplied, for their review, with past audits covering their assigned audit subjects. In many instances, their audit plans covered items of apparent weaknesses in previous audits.

-Since January 1983, NSDRC audit reports have been reviewed by the members of the NSDRC.

-Since June 1982, AEPSC QA audit reports have been reviewed by the Subcommittee for trends and the effectiveness of the QA program.

The Subcommittee has now identified all NSDRC reports for the last three (3) audit cycles which have not been subjected to all of the above described reviews. As a remedial action, the Audit Subcommittee will conduct reviews for status and adequacy of these reports. These remedial reviews, carried out in accordance with detailed review methods contained in the new Subcommittee Procedures, will be completed by June 30, 1984. The reason for limiting the remedial review to the past three (3) audit cycles is that any deficiencies would have reoccurred during this period and would have been identified during subsequent audits on the same subject during the three (3) cycles.



B.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."

a. Changes to Procedures

Between January 1, 1984 and March 1, 1984, the PNSRC will identify those plant procedures deemed to be safety related based upon criteria provided by the NSDRC. Commencing March 1, 1984 the NSDRC Subcommittee on Proposed Changes will review the Plant Nuclear Safety Review Committee's (PNSRC) Safety Review for changes to Cook Plant procedures deemed to have significant importance to plant nuclear safety, including those identified in the interim period. Commencing January 1, 1984, the PNSRC Safety Reviews for changes to Abnormal and Emergency Operating procedures will be reviewed by the subcommittee.

To date, there have been no safety reviews made for changes to AEPSC General Procedures. The AEPSC Nuclear Safety and Licensing Section (NS&L) will determine, by March 1, 1984 which General procedures are deemed important to plant nuclear safety and commence performing safety reviews on all subsequent changes to these procedures. The Subcommittee will review NS&L's safety reviews on a routine basis.

The PNSRC will select a statistically representative random sample from each plant department, of changes that have been made to plant procedures deemed to have significant importance to plant nuclear safety, and will submit the procedure/changes along with the associated safety reviews to the Subcommittee by March 30, 1984. The Subcommittee will review these safety reviews under the new Subcommittee procedures by December 31, 1984, and report to the NSDRC.

The AEPSC Nuclear Safety and Licensing Section will perform a safety review on existing General Procedures deemed important to plant nuclear safety by September 1, 1984, and will report their findings to the NSDRC.

b. Changes to Equipment and Systems

Changes to equipment or systems have been made under either Requests for Changes (RFCs) or Plant Modifications (PMs) since the initial licensing of Unit 1 and the inception of the NSDRC in 1975. From 1975 through November 30, 1983 there have been a total of 1492 RFC's approved, of which 597 were classified as safety related or safety interface and

there have been 85 PMs routed to AEPSC since the inception of the Plant Modification portion of the AEPSC Design Change Program.

The Subcommittee on Proposed Changes has reviewed 515 safety related or safety interface RFCs and 4 PMs as of November 30, 1983. Currently copies of all approved RFCs, and PMs that have been submitted to AEPSC, are being routed to the Subcommittee for review.

The Subcommittee on Proposed Changes will select and review a statistical, random sample of 80 existing safety related/safety interface RFCs and 13 PMs. This review will be completed by December 31, 1984, and findings reported to the NSDRC.

c. Review of Tests or Experiments

Annual plant operating reports and PNSRC meeting minutes will be examined under the direction of the Subcommittee on Proposed Changes, to identify any non-routine tests or experiments that have been performed on systems deemed as safety-related. Such tests and experiments will be reviewed to assure that no unreviewed safety questions existed as defined in 10CFR50.59. The Subcommittee will complete their review of any such tests or experiments by December 31, 1984.

The PNSRC procedures will be revised by February 15, 1984 to require that the safety reviews for all proposed, non-routine tests or experiments on systems deemed as safety-related, be submitted to the NSDRC Subcommittee on Proposed Changes for prior review and subsequent NSDRC approval.

d. General

The revision to the Subcommittee on Proposed Changes Charter and Procedures will ensure that the required reviews are conducted by delineation of the methods by which the Subcommittee will review the safety evaluation for changes to procedures, equipment, or systems and tests or experiments completed under the provision of 10CFR50.59.

In the case of the above outlined "historical" reviews, the samples will be deemed representative of past PNSRC, NS&L, Subcommittee activities. It will be further deemed that past practices and activities were effective in precluding the generation of an unreviewed safety question provided the historical reviews do not identify any significant safety concerns.

B3. "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."

- a. The Subcommittee on Corporate and Plant Occurences, has been, and currently is reviewing Licensee Event Reports for adequacy of corrective action. Commencing April 1, 1984, the NSDRC Subcommittee on Corporate and Plant Occurences will expand it's review to include evaluating all violations of codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions. Such violations are documented in Licensee Event Report, Cook Plant Condition Reports, AEPSC Noncompliance Reports, NRC Inspection Reports, and 10CFR21 Data Packages. These reviews and evaluation will determine whether significant safety problems exist or are developing and whether the corrective actions taken were adequate.

To ensure that conditions adverse to safety have not gone undetected, a historical review of Condition Reports, Noncompliance Reports, IE Inspection Reports and 10CFR21 data packages will be performed utilizing the new Subcommittee procedures. To date there have been approximately 5146 Condition Reports, 62 Noncompliance Reports, 280 IE Inspection Reports and 44 10CFR21 Data Packages generated. A statistical, random sample of 591 Condition Reports and 32 NRC Inspection reports will be reviewed. All of the AEPSC Noncompliance Reports and 10CFR21 Data packages will be reviewed. There reviews will be completed by April 1, 1985, and findings reported to the NSDRC.

B.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."

Starting with the minutes of Plant Nuclear Safety Review Committee (PNSRC) November, 1983 meeting number 1450, the Subcommittee on Corporate and Plant Occurences will review the minutes of each PNSRC meeting to ensure that conditions adverse to safety were adequately controlled.

A historical review of PNSRC meeting minutes will be performed on a statistical random sample of 125 meeting minutes prior to meeting number 1450. This review will be completed by December 31, 1984, and findings reported to the NSDRC.



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General

The procedures for the Subcommittee on Corporate and Plant Occurrences are being developed to ensure that all requirements are fully implemented and that Subcommittee members are trained in the procedural requirements so as to be able to perform adequately the required reviews and evaluations. The procedures will include criteria and checklists to ensure uniformity of reviews as well as a means for documentation of review findings.

The procedures for the historical reviews will include criteria specifying corrective actions to be taken should significant safety or quality concerns be found to exist. The statistical random samples will be deemed as representative of the effectiveness of past practices and activities in precluding the generation of significant safety or quality concerns provided the historical reviews do not identify any such concerns.



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C. Design Verification (Criterion III of Appendix B to 10CFR50 and ANSI N.45.2.11-1974)

1. "Design control procedures implementing the design verification requirements specified in ANSI N.45.2.11-1974. 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."

AEPSC is revising its Corporate level procedure (general Procedure No. 25 Rev. 1) to more fully implement the design verification requirements on ANSI N.45.2.11-1974. These requirements are set forth in our top tier General Procedure No. 3.0. In certain cases, it will be necessary to supplement General Procedure No. 25 with lower tier organizational specific procedures. The following is our schedule for implementation of the ANSI N.45.2.11-1974 Design Verification requirements.

January 31, 1984 - Issue preliminary revision to General Procedure No. 25. This preliminary revision is to be used to perform design verification in the interim period until the formal procedure revision is issued.

Week of February 13, 1984 - Hold meeting to review comments and finalize revision to General Procedure No. 25.

Week of March 13, 1984 - Issue revision to General Procedure No. 25.

Week of May 28, 1984 - Issue all organizational specific new procedures or procedure revisions.

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."
 - a. Although, according to the established QA programs for AEPSC and Cook Plant, the design verification requirements of ANSI N.45.2.11-1974 apply only to those design activities defined as safety-related, we have decided to expand our design verification review program to also include design changes classified as safety interface because of the possible safety implications. AEPSC will select a random, statistical sample of 50 safety-related/safety interface engineering design change RFCs (Request for Change) from the approximately 400 such changes approved since 1977. Even though these changes were implemented using the design verification methods in place at the time in General Procedure No. 25, and in the various organizational specific procedures or accepted practices, a special team will be established to oversee the review of this random sample of RFCs under the design verification criterion as set forth in AEPSC General Procedure No. 3.0 and as implemented by the above discussed revision to General Procedure No. 25.

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The purpose of this review is to process these RFCs through the upgraded design verification requirements to determine if there are any significant deficiencies or deviations. Any significant deficiencies or discrepancies will be corrected. Further reviews beyond the selected sample will depend upon the review team findings. The definition of what are significant findings and the criteria or making the decision for further reviews will be set forth in the review team procedures. This review will commence during the week of June 4, 1984 and continue until completed. The review team will submit monthly reports to the NSDRC Subcommittee on Proposed Changes and the Chairman, AEPSC Change Control Board.

- b. With respect to the design activities associated with the original design of the Cook Plant, AEPSC has initiated an effort to develop a description of the practices that were in place during that time frame. The objective of this effort is to demonstrate that these practices were at least as effective as a documented design verification, in ensuring that the design was adequate. We will look at some of the original design activities in the electrical, mechanical and structural area using the updated General Procedure No. 25 design verification requirements to verify that the past design practices were adequate. The description along with a schedule for completion of the aforementioned verification activities will be forwarded to the NRC by May 1, 1984 as an update to our R.P.I.P.

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DISTRIBUTION

~~Docket File~~

ORB#1 Rdg

CParrish

February 1, 1984

DOCKET NO(S). 50-315/316

Mr. John Dolan, Vice President
Indiana anddMichigan Electric Company
c/o American Electric Power Service Corporation
1 Riverside Plaza
Columbus, Ohio 43215

SUBJECT: DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2

The following documents concerning our review of the subject facility are transmitted for your information.

- ☐ Notice of Receipt of Application.
- ☐ Draft/Final Environmental Statement, dated _____.
- ☐ Notice of Availability of Draft/Final Environmental Statement, dated _____.
- ☐ Safety Evaluation Report, or Supplement No. _____, dated _____.
- ☐ Notice of Hearing on Application for Construction Permit.
- ☐ Notice of Consideration of Issuance of Facility Operating License.
- ☐ Application and Safety Analysis Report, Volume _____.
- ☐ Amendment No. _____ to Application/SAR dated _____.
- ☐ Construction Permit No. CPPR- _____, Amendment No. _____, dated _____.
- ☐ Facility Operating License No. _____, Amendment No. _____, dated _____.
- ☐ Order Extending Construction Completion Date, dated _____.
- ☒ Other (Specify) Monthly Notice covering period through January 26, 1984.
- Expiration date for hearing requests and comments February 27, 1984.

Division of Licensing
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc: w/enclosures

OFFICE	ORB#1:DL					
SURNAME	CParrish:ps					
DATE	2/1/84					

Indiana and Michigan Electric Company . . .

Donald C. Cook Nuclear
Plant, Units 1 and 2

cc: Mr. M. P. Alexich
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American Electric Power Service
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Mr. Wade Schuler, Supervisor
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W. G. Smith, Jr., Plant Manager
Donald C. Cook Nuclear Plant
Post Office Box 458
Bridgman, Michigan 49106

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
7700 Red Arrow Highway
Stevensville, Michigan 49127

Gerald Charnoff, Esquire
Shaw, Pittman, Potts and Trowbridge
1800 M Street, N.W.
Washington, DC 20036

Honorable Jim Catania, Mayor
City of Bridgman, Michigan 49106

U.S. Environmental Protection Agency
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The Honorable Tom Corcoran
United States House of Representatives
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James G. Keppler
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