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SUBJECT: Ack receipt of 880201 ltr re peer insp program. Util has effective quality verification program which meets 10CFR50, App B requirements. Correspondence intended only to keep NRC informed of clearer definitions applied to peer insp.

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AMERICAN ELECTRIC POWER

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Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
PEER INSPECTION PROGRAM

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

Attn: A. B. Davis

May 17, 1988

Dear Mr. Davis:

This is to acknowledge receipt of the February 1, 1988, letter from Mr. Hubert J. Miller of your staff to Mr. John E. Dolan and to express our appreciation for the opportunity to meet with Mr. Monte Phillips on March 31, 1988, to discuss our inspection programs. That letter summarizes what is a second review of our July 1987 submittal updating our Quality Assurance Program Description (AEP:NRC:0847). We apologize that we did not previously effectively communicate the entire scope of our Quality Control and Quality Verification Programs at the Donald C. Cook Nuclear Plant.

Mr. Miller's letter states, "The previous commitment for Quality Control Inspection personnel, qualified to the ANSI N45.2.6 standard, to perform acceptance inspections of completed work has been deleted and replaced by a peer inspection program by personnel qualified and certified to ANSI 18.7."

The Donald C. Cook Nuclear Plant continues to perform ANSI N45.2 type inspections with inspectors qualified and certified to ANSI N45.2.6. This commitment has neither been deleted nor is it intended to be deleted. Our letter to Mr. James Keppler on December 23, 1986, provided (1) updated information on certifying inspectors who perform N45.2 inspections and who are certified to N45.2.6, and (2) an update on our Quality Verification Programs.

As early as November 1977, the Donald C. Cook Nuclear Plant Final Safety Analysis Report recognized peer inspections as a part of

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our overall Quality Verification Program. The program at that time stated:

> Maintenance Department Procedures for safety-related components provide hold points for inspection by supervisory personnel prior to proceeding. Personnel performing an inspection or audit are required to be other than those who performed or directly supervised the activity being inspected or audited.

These, or similar, words have been included in the FSAR Quality Assurance Program Description since that date. Our December 23, 1986 letter to Mr. Keppler and the July 17, 1987 Quality Assurance Program Description update attempted only to further clarify which ANSI standards applied to the various types of inspections performed at the Donald C. Cook Nuclear Plant.

Mr. Miller's letter further states, "However, we do understand that a training program is being developed for peer inspector training and qualification, which is scheduled for implementation by June 1, 1988."

The training that we believe this refers to is our Quality Team training. This training is a supplement to our training program and is not the basic training used to ensure that personnel meet the qualification and certification requirements specified in ANSI N45.2.6 or the qualification requirements of ANSI N18.1. (ANSI N18.1 does not require that inspection personnel be "certified".) In our December 23, 1986 letter to Mr. Keppler, we explained the use of INPO accredited skills and operations training to qualify our personnel to perform their jobs and meet the requirements of ANSI N18.1. The Quality Team training is intended to provide problem solving and teamwork skills to the maintenance crews. This training includes conflict resolution and codes and standards training, and is intended to enhance, through broader understanding of the QA/QC topic, their ability to perform peer inspections. We have never intended for this additional training to be required to meet the basic qualification and certification requirements of ANSI N45.2.6 or the qualification requirements of ANSI N18.1 inspection personnel. We also have in place separate training and certifying programs for ANSI N45.2 inspection personnel.

Mr. Miller's letter asked how authority and organizational freedom of our inspecting personnel is maintained. The Quality Verification Program at the Donald C. Cook Nuclear Plant is the responsibility of the Safety and Assessment Superintendent. This department includes the Shift Technical Advisor, Quality Control,

and Nondestructive examination sections. The Safety and Assessment Superintendent receives administrative direction from the Assistant Plant Manager. The Safety and Assessment Department Superintendent is directly responsible for all N45.2 inspections, monitors through periodic surveillances the effectiveness of the N18.7 inspections, provides independent review of control room activities with Shift Technical Advisors (most of which hold NRC licenses) and administers the plant internal Corrective Action and Operating Experience Programs. All inspections, including N18.7 peer inspections, are performed by individuals other than those who performed or directly supervised the activity being inspected.

Inspection personnel are qualified to the requirements of ANSI N45.2.6 or ANSI N18.1 The appropriate qualification standard is selected based on the type of inspection activity; ANSI N45.2.6 for a non-routine activity or activities performed by non-Donald C. Cook Nuclear Plant trained personnel; ANSI N18.1 for routine activities performed by Donald C. Cook Nuclear Plant personnel. N45.2.6 inspectors are certified in Level I, II and III by discipline. ANSI N18.1 inspectors meet the job specific experience requirements of ANSI N18.1. Maintenance supervisors and maintenance mechanic A's (and senior instrument technicians) are required by our company position descriptions to have a minimum of four years relevant experience. Additionally, all maintenance mechanics (and instrument technicians) participate in INPO accredited skills training. Through this program, and specifically the qualification card/checkout process, we verify that individual mechanics (and technicians) possess the skills necessary to perform various functions. This information/status is captured in a job/person/qualification matrix. Each maintenance supervisor has this matrix available, showing the status of mechanics in his crew, to assist in identifying qualified inspectors. A matrix for all mechanics in the department is also available to the supervisor.

We believe we have an effective Quality Verification Program which continues to meet the requirements of 10 CFR 50, Appendix B and the Donald C. Cook Nuclear Plant Quality Assurance Program Description. We remain committed to performing N45.2 inspections of applicable activities and have performed over 35,000 in the last 12 months, with ANSI N45.2.6 certified inspectors, in addition to our peer inspections of routine operations and maintenance activities in accordance with ANSI N18.7. Our correspondence with the NRC on this topic has been intended only to keep you informed of the clearer definitions applied to the work activities in regard to ANSI N18.7 or ANSI N45.2 type inspections and of the program improvements we are making. These

open lines of communication are important since the emphasis on Quality Assurance in our industry is shifting from construction compliance oriented inspections to performance-based quality verification programs. We believe our program enhancements, which include better definition of our interpretation and use of ANSI Standards N18.7 and N45.2 for inspections and establishment of a new Safety and Assessment Department (which has the responsibility for verifying quality and performing ANSI N45.2 inspections), is responsive to this changing emphasis.

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

Sincerely,

M. P. Alexich
Vice President

MPA/ad

cc: D. H. Williams, Jr.
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