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SUBJECT: Forwards updated "QA Program Description for DC Cook Nuclear Power Plant," per Administrative Ltr 95-06. Attachment 1 to ltr addresses specific changes.

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August 1, 1997

AEP:NRC:0847AE

Docket Nos.: 50-315
50-316

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

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD) PROPOSED REVISION

This letter and its attachments constitute a proposed revision to the 1995 updated quality assurance program description (QAPD) and is submitted for your approval.

The majority of the proposed changes address various reassignments of responsibilities that were associated with the relocation of nuclear support functions from Columbus, Ohio, to or near the plant site in Michigan. The reorganization provided for the consolidation of engineering activities into Indiana Michigan Power Company from American Electric Power Service Corporation, and more effective use of support resources. These changes do not constitute a reduction in commitment.

A clarification of a commitment to maintain fire protection records is included in section 1.7.19.11. This proposed change clarifies the traceability requirement for fire protection items. This change clarifies the intent of the commitment and does not constitute a reduction in commitment.

As discussed in our AEP:NRC:80027A submittal, the administrative controls related to quality assurance requirements have been relocated as appendix C to the QAPD. This has been done in accordance with the guidance of administrative letter 95-06. This relocation of administrative controls related to quality assurance does not constitute a reduction in commitment.

Attachment 1 to this letter addresses each of the specific changes (other than the general repagination and changes in capitalization). The proposed changes can be readily identified by the highlighting in attachment 2, the proposed QAPD.

Sincerely,

A handwritten signature in cursive script, appearing to read 'E. E. Fitzpatrick'.

E. E. Fitzpatrick
Vice President

vlb

Attachments





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U. S. Nuclear Regulatory Commission
Page 2

AEP:NRC:0847AE

c: A. A. Blind
A. B. Beach
MDEQ - DW - RPD
NRC Resident Inspector
J. R. Padgett

ATTACHMENT 1 TO AEP:NRC:0847AE

SUMMARY OF PROPOSED CHANGES TO THE QAPD

Attachment 1 to AEP:NRC:0847AE

July, 1997 Page Number	Proposed Change (s)
	<p>Title changes have been made throughout:</p> <p>The AEPSC Senior Vice President has been elevated to Executive Vice President and also holds the position of Vice President of Indiana Michigan Power Company (I&M).</p> <p>Director of Quality Assurance has been renamed to performance assurance director.</p> <p>The Site Vice President and Plant Manager roles have been divided between two individuals with the Plant Manager reporting to the Site Vice President.</p> <p>The names of organizations have been changed throughout.</p> <p>Responsibilities previously performed by AEPSC or AEPNO have been integrated into I&M with the relocation to Michigan.</p> <p>The Quality Assurance Department has been renamed performance assurance throughout.</p>
1.7-7 4th and 5th Paragraph 1.7-42; 1.7.2.2.5	Administrative technical specifications will be moved to the QAPD, as appendix C.
1.7-8	Previous Figure 1.7-2 deleted, because nuclear generation support has been relocated to Michigan, near the plant.
1.7-11 1st Paragraph	Organization changes in the nuclear generation group.
1.7-11, 1.7-15	Organization changes in performance assurance.
1.7.14	Responsibility for selecting an NDE administrator is transferred from the engineering organization (reference 1.7-23, July, 1995 QAPD) to performance assurance.
1.7-15 Stop work orders	Delegation to new title of managers.
1.7-16	Organization name change from Nuclear Support Services to regulatory affairs.

July, 1997 Page Number	Proposed Change (s)
1st item under Regulatory Affairs 1.7-18	Operations and maintenance policies and practices have been integrated into site operations, which already had primary responsibility for these areas-reference to page 1.7-29.
2nd item under Regulatory Affairs 1.7-16	"Provide the Site Vice President with the technical and managerial guidance, direction and support to ensure the safe operation of the plant" has been reassigned to nuclear engineering and is captured in the responsibilities addressed on pages 1.7-25 through 1.7-27 of this submittal.
1st item 1.7-17	The responsibility to maintain knowledge of the latest safety requirements/regulations applicable to operation of the plant has been reassigned to nuclear engineering - reference page 1.7-25.
5th item 1.7-17	Reactor physics, core thermal hydraulic and LOCA and non-LOCA transient safety analysis and other analysis activities as requested have been reassigned to nuclear engineering-reference pages 1.7-25 and 26.
8th item 1.7-17	"Coordinate the development of neutronics and thermal hydraulic safety codes and conduct safety analysis" has been reassigned to nuclear engineering-reference page 1.7-26.
9th item 1.7-17	"Coordinate nuclear support services computer code development, and provide the interface control for nuclear support services with the AEPSC information systems department and Cook Nuclear Plant" has been reassigned to nuclear engineering-reference page 1.7-26.
2nd item 1.7-18	"Review, coordinate, and resolve all matters pertaining to nuclear safety between Cook Nuclear Plant and AEPSC. This includes, but is not limited to: the preparation of safety evaluations, or reviews, for a designated subject" has been reassigned to nuclear engineering-reference page 1.7-26.
After the 3rd item 1.7-18	"Provide support in key areas of expertise, such as nuclear engineering, probabilistic analysis, thermohydraulic analysis, chemical engineering, mechanical engineering, electrical engineering, and technical writing" has been reassigned to nuclear engineering-reference page 1.7-26.

July, 1997 Page Number	Proposed Change (s)
After the 3rd item 1.7-18	"Interface with vendors and other outside organizations on matters connected with the nuclear steam supply system and other areas affecting the safe design and operation of nuclear plants" has been reassigned to nuclear engineering-reference page 1.7-26.
After the 3rd item 1.7-18	"Participate, as appropriate, in the review of nuclear plant operating experiences, and relate those experiences to the design and safe operation of Cook Nuclear Plant" has been reassigned to nuclear engineering-reference page 1.7-26.
After the 4th item 1.7-18	"Develop, specify, and/or review conceptual criteria for Cook Nuclear Plant in accordance with established regulations. This includes all information contained in the FSAR, as well as specialized information such as, environmental qualification and seismic criteria" has been reassigned to nuclear engineering-reference to page 1.7-27.
After the 4th item 1.7-18	"Review and evaluate performance requirements for systems, equipment and materials for compliance with specified safety criteria" has been reassigned to nuclear engineering-reference to page 1.7-27.
After the 7th item 1.7-18	"Coordinate Nuclear Plant Reliability Data System (NPRDS) with INPO" has been reassigned to nuclear engineering and renamed "Equipment Performance and Information Exchange (EPIX)"-reference to page 1.7-27.
Before the 1st item 1.7-19	"Coordinate daily communication with the Cook Nuclear Plant, provide AEPSC management with a daily plant status report" has been deleted due to the relocation of personnel from AEPSC to Michigan. Communication is readily facilitated and enhanced by being at or near the plant with direct personnel interfaces.
Before the 1st item 1.7-19	"Process incoming vendor information" has been reassigned to business performance-reference to page 1.7-33.

July, 1997 Page Number	Proposed Change (s)
After the 1st item 1.7-19	Responsibilities for the radiation protection program, health physics, ALARA, radiochemistry, emergency planning, security, and general employee training have been integrated into site operations-reference to pages 1.7-31, 32 & 33.
1.7-19 1st paragraph under nuclear engineering	Deleted the words "department manager" and delineated subordinate engineering organizations.
1.7-19 2nd paragraph under nuclear engineering	I&M reorganization title changes.
2nd item 1.7-22	Qualification and certification of NDE personnel is reassigned to the performance assurance organization-reference to page 1.7-14.
9th item 1.7-22	"Prepare and administer equipment, labor and service contracts" has been reassigned to business performance-reference to page 1.7-33.
6th item 1.7-24	Deleted the word "computerized".
2nd and 3rd items 1.7-25	Responsibilities for procurement, receiving, receipt inspection, material service, etc, have been reassigned to site operations-reference to page 1.7-32 & 33.
6th item 1.7-25	Administer human resources' functions for site construction organization has been integrated into the I&M human resources organization which is diagrammatically shown in Figure 1.7-1 (page 1.7-108).
8th item 1.7-25	"Scope, bid, recommend awards and administer construction labor and service ontracts" has been reassigned to the business performance organization-reference to page 1.7-33.
1.7-28	Cook Nuclear Plant organization renamed site operations.
6th item 1.7-29	"Administer contracts and schedule outside contractor's work forces" has been reassigned to business performance-reference to page 1.7-33.
3rd item 1.7-31	"as appropriate" added for clarification.

July, 1997 Page Number	Proposed Change (s)
8th item 1.7-31	Responsibility for planning and directing engineering and technical studies, equipment performance and instrument and control maintenance has been reassigned to nuclear engineering-reference to page 1.7-27.
10th item 1.7-31	Responsibility for directing on-site fuel management, and core physics testing has been reassigned to nuclear engineering-reference to page 1.7-27.
1.7-33	Lists new business performance organization responsibilities reassigned from previous organizations.
1.7-34 Purchasing and Materials Management Department	Title change from vice president-purchasing and materials management to vice president-procurement and supply chain services.
1.7-46	Design change reviews and approvals are completed by appropriate cognizant personnel, management, and in accordance with technical specifications and regulatory requirements.
1.7-69; 1.7.9.2.2	Clarifying that certain engineering specifications are in the form of dedication plans. Also, clarifying who is responsible for preparation, review, and approval of welding, heat treating, and nondestructive requirements, respectively.
1.7-71; 1.7.9.2.3	Clarifying specific organizations responsible for welder qualifications.
1.7-73 1.7.10.2.1	"procedure which includes inspections"; added for clarification. "hold points are" added for clarification.
1.7-79 1.7.11.2.3 1.7.11.2.4	Clarification of equipment operability affected by technical specification testing. This proposed change would revise the QAPD to be consistent with technical specifications (such as 4.7.5.1.c.3 and 4.7.6.1.b.4), that allow time for completion of laboratory analysis.

July, 1997 Page Number	Proposed Change (s)
1.7-106 1.7.19.11	Clarification is provided as to specific requirements maintained for fire protection records. The proposed change is provided to clarify that the provision for traceability (previously generalized in section 1.7.17.2.6) does not include material traceability for fire protection items from suppliers (vendors), but does include those activities that occur at Cook Nuclear Plant that affect the quality of fire protection systems, structures, and components. Traceability, beyond obtaining an Underwriters Laboratory (UL) label, is not maintained for components purchased from vendors.
1.7-108 1.7-109 1.7-110	Figures updated to reflect reorganization.

ATTACHMENT 2 TO AEP:NRC:0847AE
PROPOSED QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)