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SUBJECT: Forwards "Updated QA Program Description for DC Cook Nuclear
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10CFR50.54(A)(3)

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-73
PROPOSED REVISION TO THE 1993 UPDATED
QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD)

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

Attn: W. T. Russell

May 23, 1994

Dear Mr. Russell:

This letter and its attachments constitute a proposed revision to the 1993 Updated Quality Assurance Program Description (QAPD).

Most of the proposed changes are (1) a result of organizational adjustments which focus resources on present and future needs of Cook Nuclear Plant or (2) editorial. As discussed in Attachment 1 to this letter, one of the organizational changes involves the reporting authority of the director-quality assurance. We believe that this change does not constitute a reduction in a previous QA program commitment and is consistent with previously approved QA programs.

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

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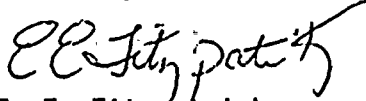
Mr. W. T. Russell

-2-

AEP:NRC:0847Z

As provided by 10CFR 50.54(a) (3) (iv), the proposed changes shall be regarded as accepted by the Commission upon receipt of a letter to this effect, or 60 days after submittal, whichever occurs first unless otherwise notified by the Commission.

Sincerely,



E. E. Fitzpatrick
Vice President

/lj

Attachments

cc: A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
NFEM Section Chief
J. B. Martin - Region III
NRC Resident Inspector - Bridgman

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 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana M 05000316

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 RECIP. NAME RECIPIENT AFFILIATION
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Q004

Mr. W. T. Russell

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AEP:NRC:0847Z

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Sincerely,



E. E. Fitzpatrick
Vice President

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Attachments

cc: A. A. Blind - Bridgman
J. R. Padgett
G. Charnoff
NFEM Section Chief
J. B. Martin - Region III
NRC Resident Inspector - Bridgman

ATTACHMENT 1

SUMMARY OF PROPOSED CHANGES TO THE QAPD

Section(s)	Proposed Change(s)
Policy Statement 1.7.1.2.1 1.7.1.2.2 1.7.1.2.3 1.7.1.2.5 1.7.2.2.1 1.7.4.2.4 1.7.18.2.12 Figure No. 1.7-1	Changed to reflect the new corporate management structure resulting from the promotion of the senior vice president nuclear generation and reorganization of resources supporting Cook Nuclear Plant. Also reflects the additional authority of E. Linn Draper, Jr. as president of American Electric Power. All primary resources for Cook Nuclear Plant now report to the senior vice president nuclear generation. The alignment of the director-quality assurance under the senior vice president nuclear generation, might be perceived as a reduction from the interim alignment of reporting to the chief executive officer (CEO). An interim alignment was established to accommodate a transition period (from January - May, 1993) for the new CEO and the retirement of a senior executive vice president. The newly appointed senior vice president nuclear generation reports to the chief executive officer and has appropriate executive authority to ensure that the persons and organizations performing quality assurance functions have the authority and organizational freedom to fulfill these functions. In addition, the senior vice president nuclear generation reports to the same level (i.e., CEO) as the former senior executive vice president. Thus, there is no reduction from what was previously approved prior to the above mentioned transition period.
Throughout QAPD	Various insignificant editorial changes, including deleting word "the" when proceeding Cook Nuclear Plant; changes in department names; addition or deletion of commas; etc.
Policy Statement 1.7.1.2.2 1.7.1.2.5 Figure No. 1.7-3 Note: These QC responsibilities were relocated from pages 1.7-25 and 26 to pages 1.7-12 and 13.	Quality control responsibilities that were previously under the plant manager are now under the director-quality assurance.

Section(s)	Proposed Change(s)
Policy Statement 1.7.2.2.4 1.7.5.2.2 1.7.5.2.3 1.7.5.2.5	Procedures used in support of Cook Nuclear Plant are being reformatted to reflect the above noted organizational changes. No changes are being made to the procedures which would conflict with the QA program requirements. The reformatted procedures are being assembled in the AEP Nuclear Organization Policy & Procedure Manual.
Policy Statement	The policy statement has been revised to clarify that AEP does not condone suppliers discriminating against their employees for raising safety concerns.
1.7.1.2.2 (page 1.7-7)	Clarification added that each manager, involved with safety-related functions is responsible for the implementation of the QA program.
1.7.1.2.3 "Operating Companies" (page 1.7-8)	All procurement activities affecting safety functions are now the responsibility of organizations reporting to the senior vice president nuclear generation. Administrative support is still provided by the Purchasing and Stores Department, as specified on pages 1.7-28 and 29. Thus, procurement support is deleted from this section.
1.7.1.2.4 (paragraph 5)	Added procurement engineer as an additional example of cognizant engineer.
1.7.1.2.4 (page 1.7-9)	Figure 1.7-3 was deleted and reference to Figure 1.7-1 is made. The previous Figure 1.7-3 was unnecessarily redundant to the updated Figure 1.7-1.
1.7.1.2.5 (QA Department) 1.7.9.2.3 1.7.9.2.4 Figure 1.7-3	<p>As stated above, quality control (inspection and nondestructive examination) responsibilities have been shifted to the QA Department. On page 1.7-12, the responsibility for directing the activities of contractor QC/NDE personnel has been changed. The word "inspection" has been replaced with the word "oversight" to clarify that the responsibility has been and is to oversee, not reinspect inspection/NDE activities.</p> <p>In addition, QA Department responsibilities now include coordination of INPO activities which was previously performed by the old Nuclear Operations Department (reference 1993 QAPD, bottom of page 1.7-16). Coordination of Nuclear Reliability Data System (NPRDS) stays with the newly named nuclear support services department (reference page 1.7-17).</p>

Section(s)	Proposed Change(s)
1.7.1.2.5 (Nuclear Support Services Department) (pages 1.7-14 and 29) 1.7.3.2.3 1.7.3.2.4	Formerly named the Nuclear Operations Department. The manager nuclear support services has also been given the title chief operations manager.
1.7.1.2.5 (Nuclear Engineering Department) (page 1.7-18) (page 1.7-19) (page 1.7-19) (page 1.7-22) (page 1.7-23)	<p>The chief nuclear engineer is also the manager-nuclear engineering department. The nuclear engineering department has and continues to provide procurement support. This section has been changed to clarify this on-going responsibility.</p> <p>Consistent with the organization changes, the fossil and hydro generation department is identified as providing technical assistance on occasion.</p> <p>The nuclear engineering department now performs some of the safety reviews previously performed by the Nuclear Operations Department. Appropriate expertise has been transferred to accommodate this change.</p> <p>The responsibility for maintaining design drawing control has been shifted to the Cook Nuclear Plant organization (reference page 1.7-27). Thus, the Design Drawing Control (DDC) program has been deleted from Nuclear Engineering responsibilities.</p> <p>Coordination responsibilities for design changes; procurement responsibilities; and material service responsibilities have been shifted from the Cook Nuclear Plant organization (reference July 1993 QAPD pages 1.7-24, 25, and 26) to Nuclear Engineering.</p>
1.7.1.2.5 (Cook Nuclear Plant) (page 1.7-23)	The plant manager has been elected Indiana Michigan Power site vice president which now provides executive authority at the site.

Section(s)	Proposed Change(s)
1.7.1.2.5 (Site Nuclear Services Department) (page 1.7-27)	<p>The former Project Management and Construction Department has been renamed the Site Nuclear Services Department and now reports to the senior vice president nuclear generation.</p> <p>Consistent with this organizational change the qualifier "construction" has been dropped from the description of the responsibility to administer and implement job orders. (Reference first site nuclear service department responsibility on page 1.7-27).</p>
1.7.1.2.5 (Purchasing and Stores Department) (page 1.7-28)	The title of the executive vice president has been changed to "administration and chief accounting officer".
1.7.2.1 (page 1.7-30)	The clarification of the definition of safety related has been revised to better clarify that some non-safety related items are classified and designed as Seismic Class 1 or Electrical Class 1E.
1.7.2.2.2 (page 1.7-32)	Revised to reflect that "management" other than the director-QA or the plant manager may apply QA controls to nonsafety-related activities.
1.7.2.2.4 (page 1.7-33) 1.7.5.2.2 1.7.5.2.3 1.7.5.2.5	<p>The AEP Nuclear Organization Policy & Procedure Manual is now used to define policies and requirements. General Procedures are being replaced by the manual. In addition, the word "corporate" is being deleted since the new manual will govern the plant site and corporate.</p>
1.7.3.2.9 (page 1.7-42)	Editorial change. The word "and" deleted after paragraph 3.
1.7.4.2.1 (page 1.7-43) 1.7.4.2.2 page 1.7-44)	Editorial change. The word "purchase" replaced with the word "procurement".



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Section(s)	Proposed Change(s)
1.7.7.2.2 (page 1.7-52)	Two editorial clarifications are proposed. First, the terms "application-specific" and "contractually" are added to clarify the type of requirements and how the requirements are imposed. Second, the phrase "by the AEPSC cognizant engineer" has been moved to qualify only the word "established" and not the word "accomplished". Accomplishment of dedication program requirements is usually via personnel (e.g. receipt testing personnel) other than cognizant engineers.
1.7.7.2.5 (page 1.7-54)	The word "vendor" is replaced with "supplier's facility".
1.7.9.2.2 (page 1.7-58)	<p>The last sentence of the first two paragraphs is deleted. The sentences unnecessarily state that audits of specifications and the NDE Manual will be performed. Specifications and the NDE Manual will continue to be audited based on performance in these respective areas. However, to note these areas as being audited when many other QA program areas are equally important appears unwarranted. This proposed change does not reduce our commitment to assure both specifications and the NDE Manual are audited.</p> <p>In addition, clarification is made that weld procedure specifications are reviewed and approved by the welding engineer, and not the records which reflect qualification of the weld procedure specifications. Also, the word "procedure" has been inserted in the phrase "Weld <u>procedure</u> qualification documentation" to clarify the type of documentation being addressed.</p>
1.7.10.2.4.a	Revised to clarify that normal or routine activities may be performed by I&M personnel or contract personnel. The peer inspection program may be used for normal or routine activities, regardless of whether I&M or contract personnel performed the activities. The focus of this section is that peer inspections are used for normal and routine activities.
1.7.10.2.4.b	<p>Consistent with the above clarification, this section has been revised to state that all "major modification and nonroutine" work performed by contract personnel is inspected per ANSI N45.2.6.</p> <p>The above proposed changes are not reductions in the inspections, instead are clarifications of how the inspections will be accomplished.</p>

Section(s)	Proposed Change(s)
1.7.13.2.1 1.7.13.2.4 Appendix B, paragraph 3a. (page 1.7-103)	Editorial change. The word "cleanliness" is replaced with the word "cleanness" which is consistent with ANSI N45.2.2 - 1972.
1.7.14.2.3	Revised to clarify that a procedure may be used to record the status of testing, as well as, job orders.
1.7.16.1 1.7.16.2.2 1.7.16.2.2	The word "problem" has been replaced with the word "condition" for consistency throughout this section. Revised to clarify that in certain cases management is notified of adverse conditions via audit or surveillance reports.
1.7.18.1	Additional clarification provided to recognize that the audit program is supplemented with limited scope surveillances. Those surveillances are used as an input to future audit planning.
1.7.18.2.4	In certain cases, the audit report itself is used to document insignificant adverse conditions and the associated corrective actions, rather than adding such minor issues to the corrective action system. To document such minor issues in the corrective action system would distract resources inappropriately.
Appendix A (page 1.7-95)	Previous Item 16 "Reg. Guide 1.108 (8/77)" has been deleted. This deletion is consistent with the NRC position to withdraw Regulatory Guide 1.108, as stated in Eric S. Beckjord's (NRR) letter dated July 19, 1993. Requirements for diesel generators are specified in Technical Specification 3/4.8.
Appendix B (page 1.7-118)	Item 15 has been added to make the QAPD consistent with the approved Technical Specifications. Specifically, the NRC previously approved an interpretation in Technical Specification 6.2.2.h that the operations superintendent must hold or have held a senior operator license and that one mid-level operations production supervisor shall hold a current senior operator license.

ATTACHMENT 2
PROPOSED CHANGES TO THE QAPD

QUALITY ASSURANCE PROGRAM DESCRIPTION

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1.7.2	Quality Assurance Program	1.7-29
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ATTACHMENT 1
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Policy Statement	The policy statement has been revised to clarify that AEP does not condone suppliers discriminating against their employees for raising safety concerns.
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1.7.2.2.4 (page 1.7-33) 1.7.5.2.2 1.7.5.2.3 1.7.5.2.5	<p>The AEP Nuclear Organization Policy & Procedure Manual is now used to define policies and requirements. General Procedures are being replaced by the manual. In addition, the word "corporate" is being deleted since the new manual will govern the plant site and corporate.</p>
1.7.3.2.9 (page 1.7-42)	Editorial change. The word "and" deleted after paragraph 3.
1.7.4.2.1 (page 1.7-43) 1.7.4.2.2 page 1.7-44)	Editorial change. The word "purchase" replaced with the word "procurement".

Section(s)	Proposed Change(s)
1.7.7.2.2 (page 1.7-52)	Two editorial clarifications are proposed. First, the terms "application-specific" and "contractually" are added to clarify the type of requirements and how the requirements are imposed. Second, the phrase "by the AEPSC cognizant engineer" has been moved to qualify only the word "established" and not the word "accomplished". Accomplishment of dedication program requirements is usually via personnel (e.g. receipt testing personnel) other than cognizant engineers.
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1.7.10.2.4.a 1.7.10.2.4.b	<p>Revised to clarify that normal or routine activities may be performed by I&M personnel or contract personnel. The peer inspection program may be used for normal or routine activities, regardless of whether I&M or contract personnel performed the activities. The focus of this section is that peer inspections are used for normal and routine activities.</p> <p>Consistent with the above clarification, this section has been revised to state that all "major modification and nonroutine" work performed by contract personnel is inspected per ANSI N45.2.6.</p> <p>The above proposed changes are not reductions in the inspections, instead are clarifications of how the inspections will be accomplished.</p>

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1.7.13.2.1 1.7.13.2.4 Appendix B, paragraph 3a. (page 1.7-103)	Editorial change. The word "cleanliness" is replaced with the word "cleanness" which is consistent with ANSI N45.2.2 - 1972.
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1.7.18.1	Additional clarification provided to recognize that the audit program is supplemented with limited scope surveillances. Those surveillances are used as an input to future audit planning.
1.7.18.2.4	In certain cases, the audit report itself is used to document insignificant adverse conditions and the associated corrective actions, rather than adding such minor issues to the corrective action system. To document such minor issues in the corrective action system would distract resources inappropriately.
Appendix A (page 1.7-95)	Previous Item 16 "Reg. Guide 1.108 (8/77)" has been deleted. This deletion is consistent with the NRC position to withdraw Regulatory Guide 1.108, as stated in Eric S. Beckjord's (NRR) letter dated July 19, 1993. Requirements for diesel generators are specified in Technical Specification 3/4.8.
Appendix B (page 1.7-118)	Item 15 has been added to make the QAPD consistent with the approved Technical Specifications. Specifically, the NRC previously approved an interpretation in Technical Specification 6.2.2.h that the operations superintendent must hold or have held a senior operator license and that one mid-level operations production supervisor shall hold a current senior operator license.

ATTACHMENT 2
PROPOSED CHANGES TO THE QAPD

QUALITY ASSURANCE PROGRAM DESCRIPTION

FOR THE COOK NUCLEAR PLANT

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