



## Nebraska Public Power District

GENERAL OFFICE  
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August 2, 1979

Director, Nuclear Reactor Regulation  
Mr. Thomas A. Ippolito, Chief  
Operating Reactors Branch No. 3  
Division of Operating Reactors  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Request for Additional Information  
Cooper Nuclear Station  
NRC Docket No. 50-298, DPR-46

Dear Mr. Ippolito:

Based on discussions with the Regulatory Staff on July 24, 1979 requesting additional information on Sections 8.2 and 8.6 of Amendment 39 to the Cooper Nuclear Station Quality Assurance Policy Document, the exceptions noted in our submittal dated May 24, 1979 have been revised and are submitted as Enclosure I of this letter. Revisions to the submittal of May 25, 1979 are indicated by a bar in the right hand margin.

Should you have any questions or require additional clarification regarding Section 8.0 to Amendment 39, please contact me.

In addition to one original, 39 copies of this information are also submitted.

Sincerely,

Jay M. Pilant  
Director of Licensing  
and Quality Assurance

FEW/cl

Enclosure

522 300

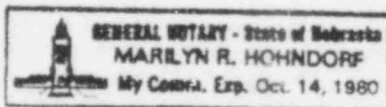
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STATE OF NEBRASKA )  
 ) ss  
PLATTE COUNTY )

Jay M. Pilant  
Jay M. Pilant

*Marilyn R. Holadof*  
NOTARY PUBLIC

Oct. 14, 1980



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NRC REQUEST FOR ADDITIONAL INFORMATION

RE: QA PROGRAM

7/24/79

Item 24A (Section 8.2)

Provide a commitment that work instructions are reviewed by the QA or QC organization to assure among other things the adequacy of cleaning requirements and access control, or provide an alternative for our evaluation.

Response to Item 24A

See Enclosure I (page D-9-81)

Item 29A (Section 8.6)

It appears that the second part of item 29 was not responded to. Please specify the qualification and/or organization of the individual or individuals who evaluate instrumentation, evaluate material acceptability, specify design mixes, evaluate results of cylinder tests, and inspect batch plant controls.

Response to Item 29A

See Enclosure I (page D-9-85)

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of the overall work instructions. System cleanliness is controlled at CNS by the following methods:

- 1) Parts and components are checked for cleanliness during receipt inspection and stored in a manner that will ensure adequate levels of cleanliness are being maintained.
- 2) Work instruction will be reviewed by Quality Control to assure that adequate cleaning and access controls are incorporated into work instruction and associated safety-related activities.
- 3) Parts and components are inspected for cleanliness prior to installation in accordance with CNS maintenance procedures.
- 4) The work area is maintained at a cleanliness level appropriate to the maintenance or modification activity being performed.
- 5) Quality Control inspections before, during and after safety-related maintenance or modification activities address system cleanliness.
- 6) Random QA audit and surveillance of safety-related maintenance or modification activities requires verification of part, component and system cleanliness.

#### Criteria for Cleaning (Section 3)

For cleanliness classifications where the scope of plant modification work is such as to make application of the guidance provided by this standard practicable, the cleanliness classifications and requirements thereof shall be evaluated and applied, as appropriate, as a part of the overall work requirements.

For most modification or maintenance work, however, involving only small portions or individual components of larger systems, it is not considered practicable to conduct cleanliness tests with ASTM E11-70 Series. Appropriate cleanliness will be maintained during the work and preoperational flushing will be conducted, consistent with the scope of the work performed and the original design requirements. Flushing is an additional precaution to insure system cleanliness. Controlling the parts and components and the work area has provided CNS with reasonable levels of assurance that system cleanliness will be maintained. In addition to the above, the Water Chemistry Department routinely samples and tests for system cleanliness, corrosion, crud build-up etc.

### 8.3 ANSI N45.2.2 Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants, (During the Construction Phase)

#### (a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.38 shall be applied to packaging, shipping, receiving, storage and handling activities associated with safety-related items except as noted below.

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#### Personnel Qualifications (Section 2.4)

The Operational QA Program includes provisions for ensuring that qualified personnel are assigned to monitor work activities. (Please refer to Section 8.7 of this document.)

#### Calibration and Control (Section 2.5.2)

The requirements of control and calibration of measuring and test equipment set forth by this standard shall be applied to all measuring and test equipment used by NPPD or their agents, test laboratories and contractors. Such requirements, however, will not be imposed on commercial batch plant facilities. Instrumentation at commercial batch plant facilities will be evaluated by CNS plant management to determine that sufficient accuracy can be obtained and will be verified by an independent QA audit.

#### Qualification Tests (Section 3.2.1)

For small quantities of concrete involved in modification work, all concrete must be purchased from commercial concrete batch plants. For small quantities of concrete, it is unreasonable to expect commercial facilities to shut down normal operations to provide certified aggregate, cement, admixtures, fly ash, water, etc. In this respect, the qualification tests required by Table A for aggregate; cement; admixtures; fly ash and pozzolans; water and ice will not be required. Appropriate evaluations will be made to determine that good quality and generally acceptable materials are used. CNS plant management evaluation, coupled with slump tests, air entrainment tests and concrete cylinder strengths, will provide adequate control and qualification of the concrete. The results of evaluation will be verified by an independent QA audit.

Design mixes consistent with, or equivalent to, original requirements will be specified and the results of the cylinder tests will be evaluated by CNS plant management based on the acceptance criteria associated with the original design mix requirements and will be verified by an independent QA audit.

#### Protection of Materials (Section 4.2)

The inspection requirements of Section 4.2 will not generally be performed, as the small quantities of concrete involved in modification work will no doubt be mixed using materials already in the batch plant bins. Control of storage of materials would not be practicable.

#### Measuring, Mixing and Transporting (Section 4.3)

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If available, appropriate certifications shall be obtained from the concrete supplier which verify the adequacy of truck mixers per the requirements of ACI-304, ASTM C-94. Where certifications are not available, two concrete test cylinders representing the first and last one-third of truck mixer contents shall be taken for evaluation of the mixer truck, over and above the normal concrete cylinders taken to evaluate the in-place concrete. The concrete batch plant facility shall be inspected by CNS plant management and the CNS QA staff to assure that reasonable controls are being exercised with reference to the inspection guidelines set forth by Section 4.3(1) and (2).