



## Nebraska Public Power District

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QAD930261

April 8, 1993

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Gentlemen:

**Subject: Cooper Nuclear Station  
Quality Assurance Program  
NRC Docket No. 50-298, DPR-46**

This letter transmits to you Revision 9 of Cooper Nuclear Station's (CNS) Quality Assurance Program. This program document is referenced in Appendix D to the USAR and is being submitted in accordance with 10CFR50.54(a) and 10CFR50.71.

Attachment "A" is a summary of the changes made and submitted herein. None of the changes represent a reduction of commitment in the CNS Quality Assurance Program.

Previous revisions to this program document which have been submitted are: Rev. 1, 4/29/85; Rev. 2, 5/16/85; Rev. 3, 3/27/87; Rev. 4, 4/5/88; Rev. 5, 4/19/89; Rev. 6, 4/6/90; Rev. 7, 4/10/91; and Rev. 8, 3/27/92. Should you have any questions or comments concerning this revision, please contact me.

Sincerely,

G. R. Horn  
Nuclear Power Group Manager

GRH/drr:lm

Attachments

cc: U. S. Nuclear Regulatory Commission  
Regional Administrator - Region IV

Senior Resident Inspector  
Cooper Nuclear Station

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P PDR

Powerful Pride in Nebraska

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# SUMMARY OF CHANGES

Attachment "A"

Page 1 of 8

PAGE	CHANGE	COMMITMENT REDUCTION
iii	Title changes in the Table of Contents. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.	No
iv	Added new section to Table of Contents. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
v	Added additional identification of oversight responsibilities for the on-site and off-site safety review committees. This change is necessary to clarify organizations with oversight responsibility. This change does not constitute a reduction in commitment based on the fact that it provides clarification and does not reduce oversight activities.	No
1-2	Editorial changes in Sections 1.1 and 1.2.	No
1-3	Editorial changes.	No
1-4	Editorial change.	No
1-5	Added Nuclear Quality Procedures in the first paragraph. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
1-9	Changed Essential to Quality to reflect redefinition of that procurement classification. This change is necessary due to process upgrades taken in response to the NRC Inspection of the Procurement Program. This change does not constitute a reduction in commitment based on the fact that it resulted from upgrades in the procurement program.	No
1-15	Added the definition of Nuclear Quality Procedures. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No

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PAGE	CHANGE	COMMITMENT REDUCTION
1-17	Added Nuclear Quality Procedures in the first full paragraph, clarified the purpose of Quality Assurance Instructions. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
1-18	Retitled from Essential Commercial Grade to Quality Commercial Grade and changed the definition to reflect current practice. This change is necessary due to process upgrades taken in response to the NRC Inspection of the Procurement Program. This change does not constitute a reduction in commitment based on the fact that it resulted from upgrades in the procurement program.	No
1-20	Title change to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.	No
1-21	Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
1-22	Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
2-2	Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No

# SUMMARY OF CHANGES

Attachment "A"  
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PAGE	CHANGE	COMMITMENT REDUCTION
2-4	<p>Added the Nuclear Support Division to the discussion of Table 1. This change is necessary due to an oversight in including this Division. This change does not constitute a reduction in commitment based on the fact that it clarifies responsibilities.</p> <p>Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.</p>	No
2-5	<p>Clarification added to allow credit to be taken for approved courses given by the Nuclear Training Department. This change is necessary to allow flexibility in the methods available to meet this commitment. This change does not constitute a reduction in commitment based on the fact that the original commitment is maintained.</p>	No
2-12	<p>Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.</p>	No
2-13	<p>Changed Essential Commercial Grade to Quality Commercial Grade. This change is necessary due to process upgrades taken in response to the NRC Inspection of the Procurement Program. This change does not constitute a reduction in commitment based on the fact that it resulted from upgrades in the procurement program.</p>	No
2-19	<p>Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.</p>	No

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PAGE	CHANGE	COMMITMENT REDUCTION
2-20	<p>Changed Essential Commercial Grade to Quality Commercial Grade. This change is necessary due to process upgrades taken in response to the NRC Inspection of the Procurement Program. This change does not constitute a reduction in commitment based on the fact that it resulted from upgrades in the procurement program.</p> <p>Title change to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.</p> <p>Clarified requirements for the release of nonconforming items. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility. The second portion of this change is editorial.</p>	No
2-27	Editorial change.	No
2-30	Format change to add a header for the section on Nonconformance Reports. This change is necessary to provide format consistency. This change does not constitute a reduction in commitment based on the fact that it is editorial in nature.	No
2-31	Added a discussion of the Deficiency Report Program. This change is necessary due to the addition of a new corrective action program which is intended to ensure that deviations which do not meet the criteria for an NCR are also evaluated. This change does not constitute a reduction in commitment based on the fact that it adds to the corrective action program.	No
2-34	Changed the NCR distribution list to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.	No

# SUMMARY OF CHANGES

Attachment "A"

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PAGE	CHANGE	COMMITMENT REDUCTION
2-36	Added a statement concerning scheduling audits in accordance with Regulatory Guide 1.33. This change is considered an editorial change because it adds a reference to the Regulatory Guide to the text section of the document in addition to its inclusion in Section 2.2.	No
3-3	Added a reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
3-5	<p>Title change to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.</p> <p>Added a reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.</p>	No
3-6	Title change to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.	No
3-7	Added a reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No

# SUMMARY OF CHANGES

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PAGE	CHANGE	COMMITMENT REDUCTION
3-9	Added a reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
3-10	Title change to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.  Added a reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
3-11	Title changes to reflect reorganization. Clarified responsibilities following reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.  Added a reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
3-12	Clarified responsibilities following reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.	No



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PAGE	CHANGE	COMMITMENT REDUCTION
3-13	Title changes to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.  Editorial changes.	No
3-14	Title change to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.	No
3-15	Added clarification concerning approval of contractor's procedures. This change is necessary due to an increase in the approval of responsibility for contractor's procedures. This change does not constitute a reduction in commitment based on the fact that the level of approval required is increased.	No
3-16	Added clarification concerning contractors performing work under the District's QA Program. This change is necessary to ensure that the Policy Document clearly defines District and Contractor responsibilities for work performed at CNS. This change does not constitute a reduction in commitment based on the fact that it clarifies existing requirements.	No
3-17	Editorial changes.	No
4-1	Added references to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
4-4	Added discussion of the NQPs and clarified the purpose of QAIs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No



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PAGE	CHANGE	COMMITMENT REDUCTION
4-5	Title changes to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.	No
4-7	Title change to reflect reorganization. This change is necessary due to management reorganization at the site. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.	No
	Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	
5-2	Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
5-3	Added reference to the NQPs. This change is necessary due to the addition of new procedures. This change does not constitute a reduction in commitment based on the fact that these new procedures cover activities previously proceduralized in Quality Assurance Instructions.	No
F1	Revised the organization chart to identify current positions. This change is necessary due to the change in classification of one position from a QA Engineer to a QA Specialist. This change does not constitute a reduction in commitment due to the fact that the functions of the position remain essentially the same.	No

10 CFR 50.54 (a)

1. [10 CFR 50.54 (a) (3)] Does the change reduce the commitments in the program description previously accepted by the NRC?

Yes \_\_\_\_\_

No ✓

If No, submit to the NRC in accordance with 10 CFR 50.71.

If Yes, submit to the NRC in accordance with 10 CFR 50.4.

Completed By DR Robinson

Date 5 April, 1993