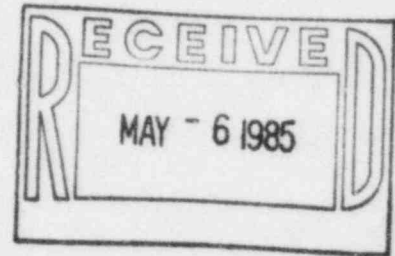


## Nebraska Public Power District

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April 29, 1985

Mr. Robert D. Martin  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011



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

Dear Mr. Martin:

In accordance with 10CFR50.54(a), this is to inform you that the Cooper Nuclear Station Quality Assurance Program previously submitted to your office as Appendix D Revision 1, to CNS USAR has been revised.

Attachment A is a summary of the changes made and submitted as Revision 2 to Appendix D to the USAR. Attachment B is a complete copy of Revision 2. The majority of changes reflect minor wording or clarification which does not represent a reduction in the present QA program effectiveness. Areas of concern identified during the recent Performance Appraisal Inspection and in NRC Region IV letter, E. H. Johnson to J. M. Pilant, dated October 10, 1984, are also addressed in this revision.

Should you have any questions or comments, please contact me.

Sincerely,

Jay M. Pilant  
Technical Staff Manager  
Nuclear Power Group

JMP/FEW:ck

cc: NRC Document Control Desk

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Cooper Nuclear Station Quality Assurance Program - Revision 2

1. Pages i and iii Added new "Corporate Policy Statement". Corrected Table of Contents and endorsed ANSI N45.2.6-1978 and ANSI N45.2.9-1979 (see last page).
2. Page iv Revised management endorsement to "Quality Assurance".
3. Page 1-1 First sentence, third paragraph clarified.
4. Page 1-2 Second paragraph, changed "supervisory" to "all".
5. Page 1-2 Seventh paragraph, removed the word "essential".
6. Page 1-2 Deleted Section 1.3.b; same as Section 1.3.e.
7. Page 1-2 Clarified new Section 1.3.b. Added "add operational and safety-related". Also removed "essential".
8. Page 1-3 Clarified new Section 1.3.d by adding "equal to or better than those".
9. Page 1-3 Changed Section 1.3.i. to include all NCR's.
10. Page 1-3 Added new Section 1.3.k. Spent fuel shipment activities shall be accomplished in accordance with regulatory requirements (10CFR Part 71).
11. Page 1-3 First paragraph under Section 1.4 added "and to other selected system defined in implementing QA procedures".
12. Page 1-5 Under Section 1.5 added definitions for 1) Quality Assurance Documents, 2) Quality Assurance Records, and 3) Supplier Evaluation.
13. Page 1-5 Revised Quality Assurance Instruction by deleting "where appropriate and of other CNS organizations". It is not this group's responsibility to define other CNS organizations' responsibilities.
14. Page 2-1 Deleted last sentence of first paragraph. Does not belong in this section.
15. Page 2-1 Second paragraph, eliminated excess wording.
16. Page 2-1a Figure I was revised to show new positions. A QC coordinator was added in response to PAT audit concerns.
17. Page 2-1 Delete third paragraph, it was redundant.
18. Page 2-1 Added "for the" to fourth paragraph.
19. Page 2-1A Added asterisk to Senior QA Specialist.

20. Page 2-2 Combined the first and second paragraphs. Deleted third sentence and added "associated with plant modifications" to fourth sentence.
21. Page 2-2 Second paragraph, second sentence, added "continue to".
22. Page 2-2 Added new third paragraph. In addition to . . .
23. Page 2-2 Last paragraph, added "assist in performing".
24. Page 2-3 First paragraph, second sentence, added "ongoing . . . and personnel with nuclear plant responsibilities". Deleted "departmental" from last sentence.
25. Page 2-3 Section 2.3 was revised to more clearly define design control for commercial grade spare parts and replacement parts used in safety-related (essential) grade (applications) in addition C of C are no longer acceptable for qualifying identical replacement parts. This revision was requested by Region IV and does not represent a reduction in Quality Assurance Program effectiveness.
26. Page 2-4 Clarified second paragraph.
27. Page 2-4 Fourth paragraph, last sentence, added "or an equivalent program which assures the necessary level of quality (as determined by NPPD QA). Any variations from 10CFR50 Appendix B will be indicated in the purchase documents".
28. Page 2-4 Revised Section 2.5 to include "along with special test procedures and special maintenance procedures".
29. Page 2-5 Section 2.6, removed QAI-7 from last paragraph. Control of document will be in accordance with ANSI N45.2.9-1979.
30. Page 2-5 Section 2.7, first paragraph, last sentence, added "area . . . identify . . . required".
31. Page 2-6 Revised second paragraph. Replaced "vendors" with "suppliers".
32. Page 2-6 Third paragraph, added "reevaluate the" and deleted "during manufacturing and installation" from first sentence.
33. Page 2-6 Fourth paragraph, added "or essential commercial grade" to first sentence.
34. Page 2-6 Section 2.7, fifth and sixth sentences, minor wording changes.
35. Page 2-6 Section 2.8, minor wording changes.
36. Page 2-7 Sections 2.9 and 2.10, minor wording changes.

37. Page 2-8 First and second paragraphs, deleted references to initial startup.
38. Page 2-8 Section 2.12, minor wording changes.
39. Page 2-9 Section 2.14, minor wording changes.
40. Pages 2-5  
and 2-10 Section 21.5, minor wording changes.
41. Page 2-11 First paragraph, minor wording changes. Deleted second paragraph as it is covered in the previous paragraph.
42. Page 2-11 Section 2.17, first paragraph, minor wording changes.
43. Page 2-11 Section 2.17, last sentence, second paragraph, deleted "two (2) hour Class B cabinets will be provided for record storage at CNS". It is the responsibility of CNS and GO management to provide adequate protection for vital records now stored in CNS and GO active working files. Time frame for submitting records to record storage will be determined by their respective administrative procedure. This protection should meet the minimum requirements established in ANSI N45.2.9-1979".
44. Page 2-13 Last sentence, added "and station operating conditions".
45. Page 2-16  
through 2-27 Updated Table 2.
46. Page 3-1 Section 3.1, minor wording changes.
47. Pages 3-2  
and 3-3 Section 3.2.2 was revised per Region IV request.
48. Page 3-6 Section 3.3.1, revised to reflect organization described in USAR.
49. Page 3-7 Section 3.7, second paragraph, first sentence, added "of Technical Specifications".
50. Page 3-7 Last paragraph, added "sections . . . of Technical Specifications".
51. Page 3-8 Third paragraph, added "SRAB Administrator for distribution".
52. Page 3-8 Section 3.6, removed "vendors" and replaced with "suppliers" throughout the section. Revised first sentence, last paragraph to include "to procedures previously approved by NPPD organization having primary responsibility for the particular work being performed".

53. Page 3-10 Section "A" added a) "not to include immediate supervisor". "b) Second level - QA surveillances" and "c) third level - QA audits" sections were clarified.  
  
Figure 2 was updated to reflect current organization. SRAB and SORC Chairmen were also identified.
54. Page 4-1 First paragraph, deleted last sentence, "identification system has been set up and is functioning".
55. Page 4-1 Eighth paragraph, second sentence, was deleted - "not practical".
56. Page 4-2 Section 4.1.2, deleted first sentence as NPPD management is committed to Quality Assurance for operation.
57. Page 4-3 QAI-16, title changed to "Supplier Approval" and added QAI-18, "Stop Work".
58. Page 4-4 Changed following:  
  
QAP-001 Preoperational Test Program to Restart Test Program  
  
QAP-700 Nonroutine Maintenance to Repair Maintenance  
  
QAP-1100 Routine Maintenance to Preventative Maintenance  
  
QAP-2000 NRC Reporting and Responding Activities to Reporting and Responding Activities (Commitment Tracking)  
  
QAP-2200 SRAB Activities to SRAB and SORC Activities  
  
Added the following:  
  
QAP-2500 ATWS System (in preparation)  
  
QAP-2600 Special Processes and Dedicated Procedures (in preparation)  
  
QAP-2700 Training
59. Page 4-5 Sixth paragraph, minor wording changes.
60. Page 5-1 Revised Section 5.0 to more clearly define objectives. Deleted paragraphs four, eight, and nine - redundant.
61. Page 6-1 Third paragraph, changed "6.6" to "6.4" and added "11) Procurement Records".
62. Page 7-1 Item 7.3, changed to "updated safety". Item 7.10, changed to N45.2.9-1979. Item 7.12, corrected to N45.2.11-1973.



- 63. Page 8-2           Item 5, removed 1973 from ANSI N45.2.6.
- 64. Page 8-2           Item 6 deleted "radiography . . . and the likes".
- 65. Page 8-4           Revised requirement (Section 3) to read "the CNS fire protection system, as determined by the NRC".
- 66. Page 8-4           Item (c) Implementation, deleted last sentence under this section.
- 67. Page 8-7           (b) Specific Exceptions, under ANSI N45.2.6, revised first paragraph. Deleted second and third paragraphs which outlined the specific exceptions taken to this standard in response to a PAT audit commitment.
- 68. Page 8-8           Deleted (b) Specific Exception section under ANSI N45.2.9.

#### Analysis of ANSI N45.2.6 - 1973 vs. 1978

ANSI N45.2.6, "Qualification of Inspection, Examination, and Testing Personnel for Nuclear Power Plants", 1978 Edition.

The 1973 Edition applies to "construction" type inspectors (paragraph 1.2) and is not as well written as the 1978 Edition. The 1978 Edition is not restricted to "construction" and more clearly defines education and experience requirements; certification of qualification requirements; periodic inspection performance requirements; and specific functions the various levels of inspectors are allowed to perform. In addition, the 1978 Edition more clearly shows that a higher level inspector can perform a lower level inspector's duties.

Both Editions have the same basic requirements, but the 1978 Edition was selected mainly because of its clarity and applicability to all phases of a nuclear power plant.

#### Effect

No reduction in QA Program effectiveness.

#### Analysis of ANSI N45.2.9 - 1974 vs. 1979

ANSI N45.2.9, "Requirement for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Plants", 1979 Edition.

The 1979 Edition more clearly defines record retention requirements; the structural requirements for a single facility; and a new requirement for lost or damaged records.

The 1979 Edition has a new paragraph, 5.7, "Lost or Damaged Records", that requires a procedure for providing replacement or restoration of records if lost or damaged. This paragraph indicates a possible re-examination of items or activities affecting quality if records can not be replaced.

Effect

The significant difference noted is that the 1974 Edition requires a four (4) hour fire rating for protecting quality records and the 1979 Edition requires a two (2) hour fire rating for single storage. Since NPPD is committed to the dual record storage facility concept, this does not represent a reduction in QA Program effectiveness. In addition, the NRC staff has developed specific criteria that a two (2) hour rated facility must meet to provide adequate protection for vital records. It is the District's position that the guidelines provided in the 1979 Edition fulfill requirements for adequate record management.

The proposed changes to the Policy Document have been evaluated and do not represent a reduction in the District Quality Assurance Program effectiveness.