

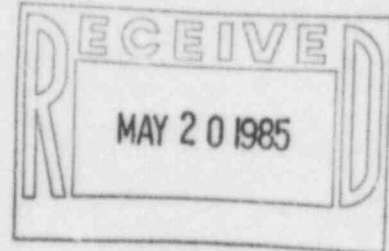
Nebraska Public Power District

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QA8500214

May 16, 1985

Mr. John Boardman
U.S. Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76017



Dear Mr. Boardman:

In response to your telephone request of May 10, 1985, the following additional information concerning Revision 2 of the CNS Quality Assurance Program for Operation is provided:

Comment: The NRC has not endorsed ANSI N45.2.9-1979.

NPPD Response: Revision 2 was revised to endorse ANSI N45.2.9-1974 and Regulatory Guide 1.88.

Comment: Inadequate fire protection for one-of-a-kind related records.

NPPD Response: Revision 2 now endorses ANSI N45.2.9-1974 with no exceptions. Alternate methods for providing fire protection for quality-related records shall be in accordance with NUREG 0800 Chapter 17.

Comment: Lack of an adequate training program exists for QC inspectors.

NPPD Response: The CNS QA Manager has been assigned the responsibility for the development of a suitable training program for QC inspectors.

Comment: Ensure that QC inspectors have sufficient independence from work they are inspecting.

NPPD Response: QC inspector will report to the CNS QA Manager to ensure sufficient independence during their inspections.

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Mr. John Boardman

May 16, 1985

Page 2

The above responses have been incorporated into Revision 2 of the CNS Quality Assurance Plan for Operation and are enclosed for your review. If this information is acceptable, please advise me, and a formal submittal of the revised pages will be initiated.

Sincerely,



George A. Trevors
Division Manager,
Quality Assurance

GAT/ck

Cooper Nuclear Station Quality Assurance Program - Revision 2A

1. Pages i and iii Added new "Corporate Policy Statement". Corrected Table of Contents and endorsed ANSI N45.2.6-1978 (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.

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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 N45.2.9-1974.
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 3-4 Added clarification of how QC concerns will be addressed by CNS QA.
49. Page 3-6 Section 3.3.1, revised to reflect organization described in USAR.
50. Page 3-7 Section 3.7, second paragraph, first sentence, added "of Technical Specifications".
51. Page 3-7 Last paragraph, added "sections . . . of Technical Specifications".
52. Page 3-8 Third paragraph, added "SRAB Administrator for distribution".
53. 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".

54. 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.
55. Page 4-1 First paragraph, deleted last sentence, "identification system has been set up and is functioning".
56. Page 4-1 Eighth paragraph, second sentence, was deleted - "not practical".
57. Page 4-2 Section 4.1.2, deleted first sentence as NPPD management is committed to Quality Assurance for operation.
58. Page 4-3 QAI-16, title changed to "Supplier Approval" and added QAI-18, "Stop Work".
59. 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
60. Page 4-5 Sixth paragraph, minor wording changes.
61. Page 5-1 Revised Section 5.0 to more clearly define objectives. Deleted paragraphs four, eight, and nine - redundant.
62. Page 6-1 Third paragraph, changed "6.6" to "6.4" and added "11) Procurement Records".
63. 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.

- 64. Page 8-1 Reworded exception to delete allowance for QC Inspector to report to same supervisor as those who did the work.
- 65. Page 8-2 Item 5, removed 1973 from ANSI N45.2.6.
- 66. Page 8-2 Item 6 deleted "radiography . . . and the likes".
- 67. Page 8-4 Revised requirement (Section 3) to read "the CNS fire protection system, as determined by the NRC".
- 68. Page 8-4 Item (c) Implementation, deleted last sentence under this section.
- 69. 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.
- 70. 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.

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

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8.4	ANSI N45.2.3 - 1973 as endorsed by Regulatory Guide 1.39 of 3-16-73	8-4
8.5	ANSI N45.2.4 - 1972 as endorsed by Regulatory Guide 1.30 (Safety Guide 30) of 8-11-72	8-5
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8.7	ANSI N45.2.6 - 1978 as endorsed by Regulatory Guide 1.58, Revision 1, of September - 1980	8-7
8.8	ANSI N45.2.8 Draft 3, Revision 3, April - 1974	8-8
8.9	ANSI N45.2.9 as endorsed by Regulatory Guide 1.88 (October - 1974 - Revision 2)	8-8
8.10	ANSI N45.2.10 - 1973 as endorsed by Regulatory Guide 1.74 of February - 1974	8-9
8.11	ANSI N45.2.11 as endorsed by Regulatory Guide 1.64, Revision 2, of June - 1976	8-9
8.12	ANSI N45.2.12 Draft 3, Revision 4, February - 1974	8-10
8.13	ANSI N45.2.13 Draft 2, Revision 4, April - 1974	8-10
8.14	ANSI N18.1 - 1972 as endorsed by Regulatory Guide 1.8 of 3-10-71	8-11
8.15	ANSI N18.7 - 1972 as endorsed by Regulatory Guide 1.33	8-11

Note: The above ANSI Standards and corresponding Regulatory Guides will serve as the baseline for NPPD commitment to NRC publications WASH-1283 (5-24-74), WASH-1284 (10-26-73) and WASH-1309 (5-10-74). Reference to ANSI Standards or Regulatory Guides in the Quality Assurance Program or implementing procedures will apply to the revision or issue date as noted above.

initialed and dated by the person making the change and by persons authorized to approve such changes.

The program will include Audits of CNS and Columbus record storage facilities to assure that the procedures and controls are properly implemented. The G.O. Records Manager and CNS station management will prepare detailed procedures for incorporating material into the files and for making decisions on removal and disposal of outdated or superseded material from the files.

The provisions of ANSI N45.2.9-1974, "Requirement for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants" shall be used for management, preservation, retention, and storage of CNS quality-related records. Alternatives to fire protection rating provisions of this standard shall be as described in NUREG-0800, Standard Review Plan, Chapter 17.

2.18 Audits

Quality Assurance Plans for each principal segment of the station operating activities have been or will be prepared. These QA Plans will identify the nature and extent of Quality Assurance Audit activities which are to be carried out by or under the direction of higher echelons of management. Primary audit responsibilities are assigned to the General Office and CNS Quality Assurance Managers. Audits under the direction of these Quality Assurance Managers (working with the Safety Review and Audit Board as referenced in Section 3.4) will be conducted according to the QA Plans to verify compliance with the Quality Assurance Program. Audits shall be performed in accordance with written instructions or checklists and conducted by trained personnel not responsible for areas being audited. In addition, other members of the NPPD Executive Management staff may audit or request audits of specific activities of particular concern to them. However, all such internal audits will necessarily be coordinated in such a way as to avoid unnecessary interference with the operating activities at the station. The provisions of ANSI N45.2.12, "Requirements for Auditing of Quality Assurance Programs for Nuclear Plants", shall be applied to vendor audit programs. It is expected that some unannounced audits will be conducted, particularly with regard to those operating activities such as emergency procedures and operator qualifications. Upon completion of the audit, a formal report will be prepared by the auditor and transmitted to the organization audited which will include an evaluation statement regarding the program's effectiveness. All nonconformances identified as a result of these audits will be documented and appropriate follow-up action will be taken to assure that corrective action has been implemented. Follow-up action, including reaudits of any identified nonconformance area and verification of corrective action, shall be fully documented and transmitted in the same manner as the original audit.

Audit summary reports shall be transmitted to the following:

- a) General Manager
- b) Assistant General Manager - Nuclear
- c) SRAB Administrator
- d) Division Manager - Nuclear Services

CNS QA Manager shall advise and assist the Division Manager of Nuclear Operations in all matters which affect the quality of the station. Similarly, he shall advise and assist all station personnel in matters regarding quality assurance and quality control. The CNS QA Manager shall designate members of the CNS QA Staff upon request to provide training and instruction programs to enable CNS personnel to effectively execute the District QA Program. CNS QA Manager is also responsible for tracking open audit items identified at CNS to the station and interface with NRC during I&E inspections at CNS. In addition, he shall also be responsible to verify that solutions to safety-related problems have been implemented and to perform scheduled audits of those activities listed in Section 4.1.3 on an announced basis. Additional specific duties shall be defined in the Quality Assurance Instructions and Plans issued in accordance with Section 4.0 of this Policy Document. The CNS QA Manager or designee shall also serve as a non-voting member of the Station Operating Review Committee (SORC). In addition, the administrative functions associated with the CNS QA Staff are under the direction of the CNS QA Manager.

The CNS QA Manager and staff will observe operations, maintenance, in-service inspection, special processes, repair or modifications, and other safety-related activities covered by the Quality Assurance program, and to recommend that work stop when such activity, in their opinion, does not comply with approved controlling document as defined in Section 3.2.2. The Division Manager of Nuclear Operation or designee is responsible to act on that recommendation and actually stop work unless he has determined such stoppage would result in a violation of the technical specification or other approved documents governing station operation or whether there are overriding considerations of safety involved.

The CNS QA Manager will provide for a coordination function for QC activities at CNS. This includes reviews of inspector certifications and performance and the establishment of a training program. This function will also provide the communication path for the resolution of QC inspector concerns.

3.2.5 Quality Assurance Staff

General Office Quality Assurance Staff

The General Office Quality Assurance Staff shall be responsible to assist and advise the General Office Quality Assurance Manager in all matters which could affect the Quality Assurance activities within the General Office. This includes advising and assisting General Office personnel in all matters regarding Quality Assurance, verify that solutions to safety-related problems have been implemented, and perform audits of work activities within the General Office on an announced or unannounced basis.

A senior staff worker has been delegated the responsibility for the ongoing development and implementation of the qualified supplier program. This includes the review of procurement specifications and associated drawings to determine if special requirements such as codes, standards, materials, tools, and inspections, etc., are included with safety-related systems or equipment requisitions generated by Nuclear Services. He shall also coordinate any activities that involved on-site and off-site Quality Assurance Programs and shall provide assistance to the CNS Quality Assurance Manager when required. In addition, a designated Quality Assurance Staff member shall act for the General Office Quality Assurance Manager during his absence.

8.0 IMPLEMENTATION, WASH-1283, -1284 AND -1309

The CNS QA Program for Plant Operations will utilize the guidance provided by NRC publications WASH-1283 (5-24-74), WASH-1284 (10-26-73) and WASH-1309 (5-10-74) ("rainbow" series) except as noted in the "Specific Exceptions" of this section.

The existing operational QA Program does not address all of the detailed requirements set forth in the "rainbow books". A detailed review has been made to determine where the CNS QA Program differs from the ANSI Standards cited in the "rainbow books."

With respect to the applicability of the "rainbow books" and the associated standards, it is impracticable to apply all of the requirements set forth by these documents to a plant for which important, and (in some respects) irreversible commitments, were made 8 to 10 years ago. It is also impracticable to apply requirements to an operating plant which were intended solely for the design and construction phase. NPPD does not now envision any major modifications or additions to Cooper Nuclear Station. In the event that any such construction were undertaken, the District would commit to compliance with the applicable portions of the WASH Series ANSI Standards. It is NPPD's intent to apply quality standards to maintenance, repair, and modification activities which will provide results which are equal to or better than the original construction.

The following sections summarize the scope and applicability of ANSI Standards and describe specific exceptions that will be taken in applying the guidance of these documents to the CNS QA Program.

8.1 ANSI N45.2 Quality Assurance Program Requirements for Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guides 1.28 and 1.33 shall be applied to the Operational QA Program to those activities affecting the safety-related aspects of the operational phase of CNS.

Where codes or standards are referenced, or are incorporated into the standard by reference, which are in conflict with original design commitments as set forth in the SAR, the SAR commitments shall govern. Later revisions of applicable codes and standards may be specifically invoked by the design requirements where deemed appropriate, consistent with the overall commitment to maintain the plant in an "equal to or better than" original condition.

(b) Specific Exceptions Quality Assurance Program (Section 2)

The QA Program describes the measures utilized to comply with the requirements of 10CFR50, Appendix B. The CNS QA Program conforms to this ANSI Standard also, except as noted below.

Inspection (Section 11)

First Level inspection has been assigned to plant personnel other than those who performed the activity being inspected. To be considered qualified,

persons performing inspection or verification activities shall meet the following requirements:

- 1) The inspector or verifier did not perform or directly supervise the work.
- 2) The quality of work will be demonstrated by a functional test if a pressure boundary has been breached.
- 3) The verifier's qualifications are reviewed and found acceptable by the QA organization prior to initiating the verification.
- 4) Individuals performing verification functions associated with normal operations of the plant will be qualified to ANSI N18.1-1971.
- 5) Individuals whose qualifications are not required to meet those in ANSI N18.1-1971 and who perform verification activities shall be qualified to ANSI N45.2.6 except that the QA experience cited for Levels I, II and III shall be interpreted to mean actual experience in carrying out the types of inspection, examination, and testing activity being performed.
- 6) All nondestructive examinations will be performed by personnel qualified and certified in accordance with SNT-TC-1A.

8.2 ANSI N45.2.1 Cleaning of Fluid Systems and Associated Components
During the Construction Phase of Nuclear Power Plants

(a) Scope and General Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.37 shall be applied to safety-related maintenance, repair, and modification activities occurring during the operational phase of Cooper Nuclear Station except as noted below.

(b) Specific Exceptions
General Requirements (Section 2)

Cleaning requirements for almost all maintenance, repair, and modification work will be considered as a part of the overall job requirements. In this respect, detailed cleaning procedures will not generally be prepared as separate documents. Necessary requirements, consistent with the scope of the work, will be included as a part 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.