



## Nebraska Public Power District

GENERAL OFFICE  
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499  
TELEPHONE (402) 564-8561

July 1, 1985

Office of Nuclear Reactor Regulation  
Operating Reactors Branch No. 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief

Dear Mr. Vassallo:

Subject: Submittal of Additional Information for Generic  
Letter 83-28

Reference: 1) Letter from D. B. Vassallo to J. M. Pilant dated  
April 23, 1985, "Request for Additional  
Information Following Preliminary Staff Review of  
Licensee Responses to Generic Letter 83-28"

Reference 1 requested additional information be provided the  
staff for Items 2.1, 2.2.2, 4.5.2, and 4.5.3 of Generic  
Letter 83-28. This supplementary information is provided in the  
attachment following a brief description of the deficiencies noted  
in Reference 1.

Should you have any questions or require additional information,  
please contact me.

Sincerely,

Jay M. Pilant  
Technical Staff Manager  
Nuclear Power Group

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Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)

Request - Your response to Part 1 is incomplete. You are requested to confirm that the review of the Reactor Trip System (RTS) classification program is complete and that it verifies that RTS components are classified as safety-related and are identified as such on all documents and in information handling systems.

Response - The Reactor Trip System (RTS) classification review has been completed, and the appropriate items have been classified safety-related (denoted as "Essential" at Cooper Nuclear Station). Furthermore, General Electric, Cooper Station's Nuclear Steam Supply System (NSSS) vendor, has been contracted to verify RTS component classification.

Cooper Nuclear Station's primary information handling system, the Equipment Data File (EDF), has been reviewed and the RTS components classification verified as safety-related. The EDF is generally the controlling system for maintenance, work orders, and parts replacement.

The Updated Safety Analysis Report (USAR) for Cooper Nuclear Station identifies the Reactor Protection System (RPS) and associated input trip components as safety-related. Station procedures, drawings, and vendor manuals (when vendor manual control is fully implemented) are all controlled procedurally the same, and not differentiated as safety-related or nonsafety-related. For example, all surveillance or operating procedure changes require Station Operations Review Committee (SORC) review and approval; all drawing changes require engineering approval; and the latest revisions of all drawings are maintained as controlled copies.

Request - Your response to Part 2 is also incomplete. You are requested to verify that periodic contact is made with all vendors of RTS components and describe how the division of responsibility between nuclear and non-nuclear divisions of vendors and the Nebraska Public Power District (NPPD) is handled. Verify that lists of vendor technical information and the information itself is available at the reactor site for audit.

Response - General Electric, the principal supplier of RTS components, has been contracted to review the vendor technical information they originally supplied and to update information, as necessary. Additionally, General Electric's scope of work will include RTS components originally supplied by others. The specific time period between contacts is still under discussion; however, the District's goal is to establish vendor contact on an

annual frequency. The overall division of responsibility between the District and the suppliers that provide service on Essential components is adequately addressed through the District's Quality Assurance programs for approval and control of qualified suppliers and related procurement instructions. Component vendor manuals are indexed, and available at the site.

Item 2.2 - Equipment Classification and Vendor Interface (Programs for All Safety-Related Components)

Request - Your response to Part 2 fails to describe the interface between all vendors of safety-related equipment and the division of responsibility between NPPD and the divisions of its vendors. Actions to be taken by vendors and NPPD to ensure that current vendor technical information is obtained and incorporated as appropriate into plant procedures and maintenance instructions are not described. You are requested to supplement your response to address this lack of information.

Response - Discussions are currently underway with General Electric, the principal supplier of safety-related equipment at Cooper Nuclear Station, to review and update (if necessary) the vendor technical information they supplied. Included in the discussions are specific division of responsibility, periodicity of contact, and safety-related equipment supplied by others. The overall division of responsibility between the District and the suppliers that provide service on Essential components is adequately addressed through the District's Quality Assurance programs for approval and control of qualified suppliers and related procurement instructions.

Nebraska Public Power District (NPPD) has contracted a consulting firm to proceduralize a vendor technical information system. The procedure will include instructions for periodic information update and procedure/maintenance instruction review. As recently stated in our response to IE Inspection Report 50-298/85-15, the schedule for inclusion of safety-related vendor technical information, other than reactor trip system components, into the document control system is closely tied to the previous Q-list development commitment as a result of Generic Letter 83-28. Per this commitment, the Q-list will be completed by July, 1986. Therefore, related vendor technical information will be included in the document control system by September, 1986.

Item 4.5 - Reactor Trip System Reliability (System Functional Testing)

Request - Your response to Part 2 is incomplete. You are requested to verify that all components needed to perform reactor trip (RTS components) can be tested on-line (backup scram

valves excepted). The results of the BWROG and GE reviews of current functional testing of backup scram valves promised for March 1, 1984, should be included for review.

Response - As specified in Reference 1, this response will be provided by July 30, 1985.

Request - Your response to Part 3 is incomplete. You are requested to provide the results of a review of existing or proposed intervals for on-line testing of the reactor trip systems that considers the concerns expressed in Items 4.5.3.1 to 4.5.3.5 of Generic Letter 83-28, shows how the selected intervals result in high reactor trip system availability, and presents and provides any needed Technical Specifications for staff review.

Response - NPPD endorses the BWR Owners' Group response to Item 4.5.3 contained in NEDC-30844 and will submit a plant-specific response after the NRC issues an evaluation of NEDC-30844.