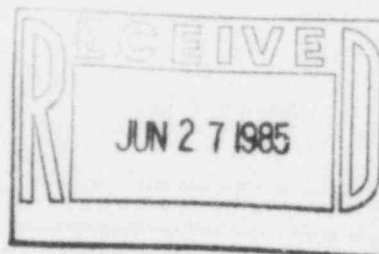


## Nebraska Public Power District

COOPER NUCLEAR STATION  
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CNSS850327

June 21, 1985



Mr. E. H. Johnson, Chief  
Reactor Project Branch I  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Subject: Nebraska Public Power District Response to IE Inspection Report  
50-298/85-15

Dear Mr. Johnson:

This letter is written in response to your letter dated May 22, 1985 which forwarded Inspection Report 50-298/85-15. Therein you indicated that certain of our activities were in violation of Nuclear Regulatory Commission requirements. The following are statements of the violations and our response to each in accordance with 10CFR2.201:

1. Statement of Violation

Failure to Perform a Safety Question Determination for Installed Temporary Jumpers

10CFR Part 50.59 requires that a change made to the facility be evaluated to determine if the change involves an unreviewed safety question.

Contrary to the above, the licensee installed temporary jumpers in plant systems without performing evaluations to determine if the changes involved an unreviewed safety question.

This is a Severity Level V Violation. (Supplement I.E.) (298/8515-01)

Corrective Steps Which Have Been Taken And The Results Achieved

The current method used to control the use of jumpers, lead disconnects, and fuse removals in plant equipment is being reviewed. The purpose of this review is to provide a method to ensure that the installation and removal of jumpers, lead disconnects and fuses are properly identified, recorded in the appropriate logs, controlled and periodically reviewed for accuracy and applicability. A format for conducting a safety evaluation for the placement of jumpers, lead disconnects, and fuse removals in plant equipment is being formulated. Specifically, concerning the 1979 installed jumper, the Engineering Department is now developing a design change to either remove the jumper or make it a permanent modification.

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The installation of the new plant process computer does not affect or resolve this jumper installed in 1979.

Corrective Steps Which Will Be Taken To Avoid Further Violation

Based on the aforementioned review, CNS Procedure 2.0.2, "Operating Logs and Reports", and 3.3, "Station Safety Evaluations", will be revised. The requirements and method for performing a safety evaluation for the placement of jumpers, lead disconnects, and fuse removals in plant equipment will be incorporated in these procedures. Appropriate personnel will then be instructed on these requirements and the method used to document and perform the safety evaluation. After development of the design change for the 1979 jumper, it will be reviewed, approved and implemented.

It is believed that these corrective steps will ensure procedural controls are in place and instruction provided to properly control the use of jumpers, lead disconnects, and fuse removals and also prevent activities which may result in an unreviewed safety question. Implementation of the design change for the 1979 jumper will resolve the issue of the safety evaluation for this jumper.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by October 30, 1985.

2. Statement of Violation

Superseded Procedures Located in the Control Room

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by and accomplished in accordance with appropriate documented instructions, procedures, or drawings. This requirement is addressed in Section 2.5 of the licensee's accepted quality assurance program which stipulates that activities that have nuclear safety significance will be prescribed by and accomplished in accordance with documented instructions, procedures, and drawings.

CNS Administrative Procedure 1.10, "Document Control", Revision 0, Attachment A, requires that superseded documents are to be destroyed, stamped "Superseded", or returned to the Administrative Services Department.

Contrary to the above, four superseded CNS procedures were found in the control room.

This is a Severity Level V Violation. (Supplement I.E.) (298/8515-02)

Corrective Steps Which Have Been Taken And The Results Achieved

A review of the procedures and the procedural control methods used in the control room was conducted. Identified were extra copies of procedures which were considered unnecessary in the control room. Extra copies of

procedures not considered important for proper control room operation were removed and limited to one copy to be kept in procedure binders, Volumes 1-11 which are maintained in the control room. In addition, all other procedures are now being limited in the number of copies to be kept in the control room to allow for better control over a smaller total number of procedures. It is believed that these corrective steps allow for the latest procedural revisions to be in place in the control room.

#### Corrective Steps Which Will Be Taken To Avoid Further Violations

A review method to ensure that the latest procedural revisions are in place in the control room is being developed. This method will outline the format to be used for a quarterly audit to be conducted on all procedures in the control room. It is expected that these corrective steps will provide the necessary controls to ensure that only the latest revisions of procedures are maintained in the control room.

#### Date When Full Compliance Will Be Achieved

Full compliance will be achieved by October 30, 1985.

### 3. Statement of Violation

#### Failure to have Procedures for Activities Affecting Quality

10CFR Part 50, Appendix B, Criterion V, requires, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings, shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished." This requirement is endorsed in Section 2.5 of the licensee's approved quality assurance program.

Contrary to the above, the licensee failed to have procedures for maintenance of safety-related equipment in the following areas:

- . Qualification, training, and independence of quality control inspectors
- . Audit program
- . Supplier quality assurance program
- . Verification of certificates of conformance
- . Receipt inspection
- . Storage of hazardous materials
- . Control of vendor technical information

- . Calibration of mechanical measuring and test equipment
- . Control of shop guides
- . Design verification
- . Evaluation and documentation of temporary lead shielding

This is a Severity Level IV Violation. (Supplement I.D.) (298/8513-03)

a. Qualification, Training, and Independence of Quality Control Inspectors

Corrective Steps Which Have Been Taken and the Results Achieved

CNS has no separate Quality Control (QC) organization. QC inspection is a collateral duty of station personnel who are certified as QC inspectors. The NRC inspection team found this approach acceptable but noted weaknesses in the program. The most significant weakness is the absence of an approved program for QC inspector training, qualification and certification to meet the requirements of ANSI N45.2.6.

The QA Policy Document has been revised to commit the District to a later version of the ANSI N45.2.6 standard and to delete the exceptions we had previously taken to this standard. Clarification regarding the required independence of QC inspectors has also been added to this document.

The position of Quality Control Coordinator has been established at CNS. This position, reporting directly to the CNS QA Department Manager, will be responsible for setting up and implementing a formal documented QC program which will provide for the training and certification of QC inspectors.

Corrective Steps Which Will Be Taken to Avoid Further Violations

No further corrective actions are planned at this time.

Date When Full Compliance Will Be Achieved

The corrective actions discussed above will be completed by March 1, 1986.

b. Audit Program

Corrective Steps Which Have Been Taken and the Results Achieved

This item notes weaknesses in the performance of QA audits. Specifically, cases were cited in which deficiencies noted in audits were not identified as findings in accordance with our QA program requirements. In addition, audits were referenced that did not address all objectives of the QA program.

The QA staff has been directed to perform more thorough reviews of deficiencies noted in audits to assure that failure to comply with documented commitments of the QA program or license requirements are properly identified. QAI-5, Guidelines for QA Audits, was revised in June 1984 to clarify the definitions of audit findings and observations and to require justification in an audit for why an observation is not classified as a finding. Significant audit observations now require responses and follow-up to assess the effectiveness of the corrective actions.

The QA staff has been instructed that all QA plan objectives must be addressed in an audit report whenever possible. In addition, the format of the report of an audit has been revised to include a separate attachment which states each QAP audit objective achieved, how it was accomplished and a list of QAP objectives which were not addressed during the audit. QAP audit objectives not addressed during an annual audit will be carried over to the next audit scheduled for the QAP.

Corrective Steps Which Will Be Taken to Avoid Further Violations

No further corrective actions are planned at this time.

Date When Full Compliance Will Be Achieved

NPPD is currently in full compliance.

c. Supplier Quality Assurance Program

Corrective Steps Which Have Been Taken and the Results Achieved

There have been occasions in the past where sole-source suppliers have been approved even though their QA programs did not meet certain parts of 10 CFR 50, Appendix B and without additional quality controls being applied.

In recognition of this weakness, QAI-16, Supplier Approval, was revised (Rev. 9) in December 1984 to require additional quality controls, such as alternative QA programs, tests or inspections, for components purchased from this type of supplier. In addition, the QA staff is more rigorous in the conduct of supplier evaluations resulting in a significantly improved list of qualified suppliers. More detail is now required in specifying QA requirements in purchase documents to ensure that adequate quality control is applied to material purchased from sole-source suppliers.

Corrective Steps Which Will Be Taken to Avoid Further Violations

No further corrective action is planned at this time.

Date When Full Compliance Will Be Achieved

NPPD is currently in full compliance.



d. Verification of Certificates of Conformance

Corrective Steps Which Have Been Taken and the Results Achieved

The QA Division no longer accepts a Certificate of Conformance as the sole basis of approving a supplier for the procurement of essential material, components, or services for Cooper Nuclear Station. When a Certificate of Conformance is requested from the supplier as additional quality documentation, it is required that the supplier identify on the certificate the original date of part purchase for CNS and a summary of all design changes that have been performed on the part since the original purchase. Prior to using the part, each design change must be evaluated by either CNS Engineering or the General Office Nuclear Engineering Department to establish the equivalency of the new part to the one originally purchased. This requirement is specified on the Approved Supplier List. In addition, receipt acceptance testing is required on these "equal to or better than" parts prior to use. QAI-16 was revised to clarify this updated approach to the procurement of parts from sole-source suppliers.

Corrective Steps Which Will Be Taken to Avoid Further Violations

No further corrective action is planned at this time.

Date When Full Compliance Will Be Achieved

NPPD is currently in full compliance.

e. Receipt Inspection

Corrective Steps Which Have Been Taken and the Results Achieved

In order to provide adequate receipt inspection as required by ANSI N45.2.2-1972, the position of Receipt Inspector has been established at CNS.

Corrective Steps Which Will Be Taken to Avoid Further Violations

The position of Receipt Inspector will be filled by an individual who will be dedicated solely to receipt inspections. Within six months after hiring the Receipt Inspector, NPPD will have in place appropriate procedures covering additional receipt inspection of essential/safety-related items.

Date When Full Compliance Will Be Achieved

The Receipt Inspector position will be filled by September 15, 1985 and pertinent procedures established by March 15, 1986.

f. Storage of Hazardous Material

Corrective Steps Which Have Been Taken and the Results Achieved

The components identified in the warehouse that were not afforded adequate protection from damage have been boxed, bagged or retagged to meet the acceptable requirements for the care of items in storage. Hazardous materials stored in the warehouse have been identified and are being segregated from essential plant items to the extent possible within the confines of the warehouse. A request for a building that would be dedicated to storage of hazardous material has been included in the CNS 1986 calendar budget year.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Pending required approval, construction of the building discussed above will begin in 1986. Upon completion of the building, necessary procedures will be developed and implemented.

Date When Full Compliance Will Be Achieved

The District anticipates completion of the hazardous materials storage building and approval of pertinent procedures by November 30, 1986.

g. Control of Vendor Technical Information

Corrective Steps Which Have Been Taken and the Results Achieved

Classification of all safety-related (essential) equipment which functions as reactor trip system components has been completed and entered into Cooper Nuclear Station's Equipment Data File (EDF). As a result of this effort, CNS Engineering Procedure 3.13, "Equipment Classification" was developed and approved. Subsequently, reactor trip system vendor technical information was fully reviewed by Cooper Nuclear Station's Nuclear Steam Supply System (NSSS) vendor, General Electric (GE). GE identified several minor points which require updating. These points have been temporarily covered, with formal documentation to follow. This will provide assurance that the vendor technical information is correct and current for CNS reactor trip system equipment.

Corrective Steps Which Will Be Taken to Avoid Further Violation

Programmatic procedures for the control of vendor technical information are currently being developed in order to satisfactorily respond to pertinent requirements of Generic Letter 83-28. This will include a document control system in which safety-related and nonsafety-related vendor technical information will be controlled. Further details can be found in the District's response to the request for additional information on Generic Letter 83-28 dated April 23, 1985.

Date When Full Compliance Will Be Achieved

The actions related to reactor trip system components will be completed prior to reactor startup from the present outage. The schedule for inclusion of all other safety-related vendor technical information 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.

h. Calibration of Mechanical Measuring and Test Equipment

Corrective Steps Which Have Been Taken and the Results Achieved

CNS Procedure 7.1.1, Revision 1, "Mechanical Gauging Equipment Control and Calibration", has been developed and approved. This procedure provides procedural controls considered adequate for calibration of mechanical measuring and test equipment.

Corrective Steps Which Will Be Taken to Avoid Further Violations

No further corrective action is planned at this time.

Date When Full Compliance Will Be Achieved

NPPD is currently in full compliance.

i. Control of Shop Guides

Corrective Steps Which Have Been Taken and the Results Achieved

Various methods to resolve this problem have been considered and plans have been formulated to ensure shop guides receive appropriate review, approval and control.

Corrective Steps Which Will Be Taken to Avoid Further Violations

To clarify the use and control of shop guides, a procedure will be developed describing: 1) the use of shop guides, 2) the review process of shop guides to be used in determining the necessity of conversion into maintenance procedures, and 3) the control of shop guides. A complete review of all shop guides used in safety-related activities will be conducted. Shop guides will be converted to maintenance procedures or, if found to contain only recommendations or guidelines, will receive appropriate technical reviews and approvals. All shop guides will be controlled.

Date When Full Compliance Will Be Achieved

The date of completion for these activities is June 1, 1986.



j. Design Verification

Corrective Steps Which Have Been Taken and the Results Achieved

Engineering Procedure 3.4 "Station Design Changes", has been revised to correct inadequacies in the design verification and design input for station design changes.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Engineering Procedure 3.4 will be revised to incorporate a two-stage method for closing station design changes. It will consist of a release for operation and a final administrative closure.

Date When Full Compliance Will Be Achieved

The revision to incorporate the two-stage method for design change closure will be completed by August 1, 1985.

k. Evaluation and Documentation of Temporary Lead Shielding

Corrective Steps Which Have Been Taken and the Results Achieved

The responsible engineer was made aware of the concern in order to prevent further violations. Additionally, for the current outage, a contractor-generated and station approved temporary shielding procedure was put in place to control the temporary shielding process for the pipe replacement effort.

Corrective Steps Which Will Be Taken to Avoid Further Violations

CNS Engineering Procedure 3.14, "Temporary Shielding Installation", has been drafted and is now undergoing required review. This procedure will provide for proper analysis and documentation required for installing temporary shielding. The temporary lead shielding presently installed will be removed prior to startup from the current outage with exception of the scram discharge volume temporary shielding.

Date When Full Compliance Will Be Achieved

CNS Engineering Procedure 3.14 will be approved by July 1, 1985. The June 1, 1985 date noted in Inspection Report 50-298/85-15 was missed; however, no temporary shielding was installed in the interim without the proper documentation, the applicable static and dynamic stress calculations and associated safety evaluation. The dynamic analysis on the remaining temporary shielding will be completed prior to startup from the current outage.

Summary

The actions taken in each of the areas addressed by this response will strengthen the CNS procedures. However, it should be noted that, in most

cases, procedures were in place for the identified activities and in some cases the procedural weaknesses had already been identified and actions were in process or being considered for strengthening them prior to issuance of this violation.

4. Statement of Violation

Failure to Follow Procedures

The CNS Technical Specification, Sections 6.3.2 and 6.3.3, requires that procedures shall be provided and adhered to for correcting specific and foreseen malfunctions of safety-related systems or components and for corrective maintenance of equipment that could have an effect on nuclear safety.

Contrary to the above, the licensee failed to adhere to the following procedures:

- . CNS Procedure 2.2.30, "Fire Protection System", Revision 22, Section K, titled, "Recovery From Header Inadvertent Depressurization".
- . CNS Procedure 7.0.1, "Work Item Tracking-Corrective Maintenance".

This is a Severity Level IV Violation. (Supplement I.D.) (298/8515-04)

Corrective Steps Which Have Been Taken And The Results Achieved

In reference to LER 84-007 and the failure of operators to utilize CNS Procedure 2.2.30, "Fire Protection System", Revision 22, Section K, this revision and procedural section was not available at the time of the occurrence of the event described in LER 84-007. Revision 22 to CNS Procedure 2.2.30, which included the addition of Section K, "Recovery From Header Inadvertent Depressurization", was initiated on May 21, 1984 and approved on June 1, 1984. The flooding of the SGTS trains discussed in LER 84-007 occurred on April 19, 1984; therefore, adherence to Section K was impossible since that section did not exist at that time. The District takes issue with this portion of this violation and believes no corrective action is necessary for this item.

In reference to LER 84-003 and the failure to adhere to CNS Procedure 7.0.1, "Work Item Tracking-Corrective Maintenance", written communication is being routed to Operations and I&C personnel. This communication states the requirements for having an approved MWR before commencement of work activities as referenced in CNS Procedure 7.0.1. It is believed that this written communication emphasizing the requirements will preclude recurrence of a situation such as that discussed in LER 84-003.

Corrective Steps Which Will Be Taken To Avoid Further Violations

In addition to the corrective steps which have been taken, the Operations Supervisor and I&C Supervisor will continue to stress to personnel the requirements of an approved MWR prior to commencing work as outlined in

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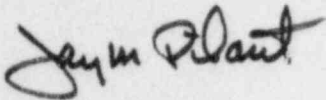
CNS Procedure 7.0.1. It is expected that these actions will preclude similar violations in the future.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by October 30, 1985.

Should you have any questions regarding this response, please contact me.

Sincerely,



J. M. Pilant  
Technical Staff Manager  
Nuclear Power Group

JMP:DAW:VLW:MLS:1b