

Nebraska Public Power District

COOPER NUCLEAR STATION
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CNSS850252

May 21, 1985

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Mr. E. H. Johnson, Chief
Reactor Project Branch 1
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report 50-298/85-13

Dear Mr. Johnson:

This letter is written in response to your letter dated April 23, 1985 transmitting Inspection Report 50-298/85-13. Therein you indicated that one of our activities was in violation of Nuclear Regulatory Commission requirements. The following is the statement of the violation and our response in accordance with 10CFR2.201:

Statement of Violation

Failure to Instruct Welders in Implementation of Welding Procedure Specifications

Criterion V of Appendix B to 10 CFR Part 50 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.

Paragraph 8.5.2 in Section 8 of Division 4 of the Chicago Bridge and Iron Nuclear Quality Assurance Manual, Issue 10, states, in part, "Welding technicians shall . . . Instruct welders in the implementation of welding procedures to be used."

Contrary to the above, welders employed by Welding Services, Inc., were not instructed by welding technicians in the implementation of welding procedures prior to performance of production welding.

This is a Severity Level V Violation. (Supplement I.E) (298/8513-01)

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Corrective Steps Which Have Been Taken and the Results Achieved

Welding Services, Inc. (WSI) was one of two automatic welding subcontractors utilized by Chicago Bridge and Iron (CBI) during the IGSCC piping replacement outage at Cooper Nuclear Station. WSI employed ten welders who received a minimum of eight hours training and testing in the welding procedures they were expected to use prior to conducting any welding operations. Each WSI welder was required to attest to his understanding of the procedures by signature.

WSI left the site on March 28, 1985. Therefore, due to the timing of their departure, corrective action with respect to this particular subcontractor could not be implemented. However, to ensure that welders working for the remaining subcontractor, GAPCO, were appropriately instructed, formal instructions in the procedure specifications were provided to the entire GAPCO welding crew, including supervision. To ensure all welding procedures were readily accessible to the GAPCO welders, information copies of all approved procedure specifications were posted on the drywell shield wall for easy access. Controlled copies of all procedure specifications were also maintained in the drywell and both GAPCO and CBI personnel received instructions relative to the location of the specifications. As a step beyond procedural requirements, weld parameter data sheets were provided to the GAPCO welding operators, which specified initial machine settings for each weld joint. These data sheets were placed at each welding console during welding machine setup for root consumption. Additional experienced welding supervision was also employed by CBI to increase the welding coverage for targeted areas such as weld repairs, installation of small bore piping, and root pass welding during the IGSCC piping replacement.

It is believed that the additional welding supervision, in conjunction with the other corrective actions discussed, has provided the necessary coverage and procedure specification instruction to assure that an acceptable degree of welding quality is achieved.

Corrective Steps Which Will be Taken to Avoid Further Violations

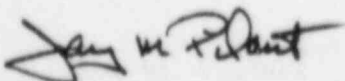
No further corrective actions beyond those discussed above are planned at this time.

Date When Full Compliance Will be Achieved

NPPD is currently in full compliance.

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

Sincerely,



J. M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP:GRH:DAW:lb