

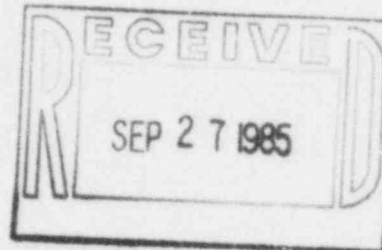
## Nebraska Public Power District

COOPER NUCLEAR STATION  
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321  
TELEPHONE (402) 825-3811

CNSS857490

September 23, 1985

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



Subject: Nebraska Public Power District Response to IE Inspection Report No.  
50-298/85-20

Dear Mr. Johnson:

This letter is written in response to your letter dated August 29, 1985, transmitting Inspection Report No. 50-298/85-20. Therein you indicated that one of our activities was in violation of Nuclear Regulatory Commission requirements. The following is the statement of violation and our response to each in accordance with 10CFR2.201:

I. Statement of Violation

Inadequate Procurement Documents Section 21.31 of 10 CFR Part 21 states, "each individual, corporation, partnership or other entity subject to the regulations in this part shall assure that each procurement document for a facility, or a basic component issued by him, her or it on or after January 6, 1978, specifies, when applicable, that the provisions of 10 CFR Part 21 apply".

Contrary to the above, Purchase Order # 231236 dated September 19, 1984, and Purchase Order #236067 dated January 14, 1985, which were issued for the supply of basic components (i.e., blind flanges and studs), did not specify that the provisions of 10 CFR Part 21 were applicable.

This is a Severity Level V violation (Supplement I.E.) (298/8520-03)

Corrective Steps Which Have Been Taken and the Results Achieved

The District is in agreement with the NRC inspector, that Purchase Orders #231236 (blind flanges) and #236067 (studs) fall within the 10CFR Part 21 definition of a basic component necessary to assure the integrity of the reactor coolant pressure boundary.

Consequently, the respective vendors have been contacted and have

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verbally indicated that 10CFR Part 21 certification can be provided for the blind flanges and studs furnished to the District under the subject purchase orders.

The District, therefore, will issue revisions to Purchase Orders #231236 and #236067 to reflect 10CFR Part 21 applicability.

Corrective Steps Which Will Be Taken to Avoid Further Violation

The root cause of this violation appears to be an incomplete understanding of Quality Assurance Instruction #9, (QAI-9), "Guidelines for Establishing Quality Classifications of Components and Materials", by Engineering personnel involved in procurement of safety-related equipment. Thus, to prevent recurrence, applicable Engineering personnel will receive refresher training focused primarily on QAI-9.

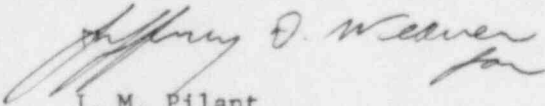
No further corrective actions beyond those discussed above are planned at this time.

Date When Full Compliance Will be Achieved

Full compliance will be achieved by December 1, 1985.

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

Sincerely,



J. M. Pilant  
Technical Staff Manager  
Nuclear Power Group

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