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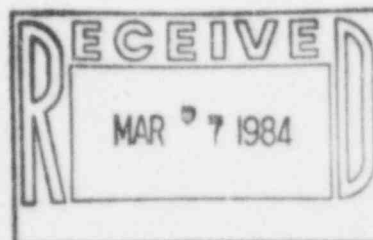
## Nebraska Public Power District

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

NLS8400080

March 5, 1984

Mr. John T. Collins  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011



Subject: Cooper Nuclear Station  
Quality Assurance Program  
NRC Docket No. 50-298, DPR-46

Dear Mr. Collins:

Reference: (a) NPPD letter, Jay M. Pilant to E. H. Johnson  
(LQA8300016) dated December 5, 1983.

In accordance with 10CFR50.54(a) and reference (a), this is to inform you that the Cooper Nuclear Station Quality Assurance Program previously submitted to your office as Appendix D, Revision 0, to the CNS USAR has been revised. With one exception, these changes represent the establishment of an independent Nuclear Power Group by the NPPD Board of Directors to enhance the safety and reliability of the District's Nuclear Program.

Attachment A is a summary of the changes made and submitted as Revision 1 to Appendix D to the USAR. Attachment B is a complete copy of Revision 1. As noted above, the majority of these changes reflect the reorganization of the District's nuclear organization which do not represent a reduction in the present QA program effectiveness. It should be noted in Section 8 of the Policy Document the District has taken exception to Section 5.6 of ANSI N45.2.9 relative to the storage of temporary records (working files) in that four hour fire rated temporary storage cabinets were not available. The District does not consider this a reduction in our approved Quality Assurance Program.

Should you have any questions or comments, please contact me.

Sincerely,

Jay M. Pilant  
Technical Staff Manager  
Nuclear Power Group

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Attachment

cc: NRC Document Control Desk

Q001

Revisions to Cooper Nuclear Station Quality Program

- Page ii Revised Table of Contents to represent new organization which was initiated by internal management audit conducted in 1982.
- Page 1-2 Third paragraph. Change "Quality Assurance Department" to "Quality Assurance Division". Quality Assurance is now a separate division. Change does not represent a reduction in the approved Quality Assurance program commitment.
- Page 2-1 Second and third paragraphs. Title change - "Power Projects" to "Nuclear Engineering Department" as a result of the reorganization. No reduction in the approved Quality Assurance program commitment.
- Sixth paragraph. Removed, "through successive levels of management" and added, "Assistant General Manager - Nuclear." One level of management was removed between the Quality Assurance Division Manager and Assistant General Manager - Nuclear. Also added Quality Assurance Division to paragraph. Changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 2-1A Revised Figure I to represent new organization. Changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 2-2 Second, third, and fifth paragraphs. Changed "Quality Assurance Department" to "Quality Assurance Division". Added "Nuclear Operations Division" and "Nuclear Services Division" to third paragraph. Added, "and now requirements are being incorporated" to same paragraph. Last paragraph. Removed, "CNS Operation, Power Projects" and added, "Nuclear Services and Nuclear Operations." Changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 2-3 Clarified first sentence.
- Second paragraph. Added Nuclear Engineering and Quality Assurance Division and clarified paragraph.
- Last paragraph. Changed from "Power Projects" to "Nuclear Engineering." The above changes represent the new organization and does not reflect a reduction in the approved Quality Assurance program commitment.
- Page 2-4 Last sentence. Change "malfunction/work request" to maintenance/work request. Does not represent a reduction in the approved Quality Assurance program commitment.
- Page 2-5 Third paragraph. Changed "Station Superintendent" to Cooper Nuclear Station Station Management as a result of the reorganization.

- Fifth paragraph. Changed Station Superintendent to Station Management and Quality Assurance Department to Quality Assurance Division as a result of the reorganization. The above changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 2-5 Seventh paragraph. Added N45.2.9 - 1974 edition. Original commitment.
- Page 2-6 Second paragraph. Changed Quality Assurance Department to Quality Assurance Division.
- Fourth paragraph. Changed storekeeper to warehouse and "Station Superintendent" to "Division Manager - Nuclear Operations". Result of new organization. The above changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 2-7 Second paragraph. Change "Station Procedures reviewed by CNS QA personnel." Change does not represent a reduction in approved Quality Assurance program commitment.
- Pages 2-8 and 2-9 Last paragraph. "When inspection, measuring, and test equipment are found to be out of calibration, an evaluation shall be made and documented of the validity of previous inspection or test results and of the acceptability of items previously inspected or tested. Should the evaluation determine that the previous or test results obtained with the affected instrument is unacceptable, a NCR will be issued." Change does not represent a reduction in approved Quality Assurance program commitment.
- Page 2-10 Third paragraph. Added a "Status Log." Change does not represent a reduction in the approved Quality Assurance program commitment.
- Page 2-11 Second paragraph. Changed "the GO QA Department" and "Division Manager of Power Operations" to "Assistant General Manager - Nuclear" as a result of the new organization.
- Designed duplicate record storage facilities, located at Cooper Nuclear Station and the General Office. Change does not represent a reduction in approved Quality Assurance program commitment.
- Page 2-12 Section 2.18 Audits. Deleted Power Operations and Power Projects as these organizations no longer exist. The executive staff still has the authority to audit or request audit. Paragraph was also revised to include "The provisions of ANSI N45.2.12 Requirements for Auditing of Quality Assurance Program for Nuclear Plants" shall be applied to Vendor Audit program and an evaluation statement regarding the program effectiveness will be included in Audit Reports. These changes do not represent a reduction in the approved Quality Assurance program commitment.
- Added record storage facilities to first and third paragraph.
- Page 2-13 Revised Audit Distribution List to represent new organization. Change does not represent a reduction in the approved Quality Assurance program commitment.

- Page 2-14  
thru 2-27 Table II changed "Administrative Procedures" to "NED Procedures". Change does not represent a reduction in the approved Quality Assurance program commitment.
- Page 3-1 Fourth paragraph. Revised sentences to represent the new organization.
- Last paragraph. Responsibility and authority for the Nuclear Group, including Quality Assurance, has been delegated to the Assistant General Manager - Nuclear. Changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 3-2 First paragraph. The responsibility for SRAB has been delegated to the Assistant General Manager - Nuclear. The Technical Staff Manager has been assigned Board Chairman and Division Manager of Quality Assurance has been assigned Vice Chairman. This change was initiated by the reorganization and does not represent a reduction in the approved Quality Assurance program commitment.
- Page 3-2 Section 3.2.2. A separate Quality Assurance Division was created during the recent reorganization to strengthen the District Quality Assurance organization and a position of Division Manager was established. Also clarified the position description. Change does not represent a reduction in the approved Quality Assurance program commitment.
- Page 3-3  
thru 3-5 Sections 3.2.3, 3.2.4, and 3.2.5 were completely rewritten to define the revised Quality Assurance Division. The position of Cooper Nuclear Station Quality Assurance Manager was established at Cooper to enhance the organization. In addition, the Cooper Nuclear Station Quality Assurance staff was doubled. The responsibility for implementing the NPPD Quality Assurance program at Cooper Nuclear Station and the General Office has been designated to the Cooper Nuclear Station and General Office Quality Assurance Managers, respectively. Also clarified the General Office and CNS Quality Assurance Staff responsibilities. The position of General Office QA Secretary was established and filled. These changes do not represent a reduction in the approved Quality Assurance program commitment.
- Pages 3-5  
and 3-6 Sections 3.2.6, 3.2.7, 3.3, and 3.3.1 were completely revised to represent the new nuclear organization. These changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 3-6  
3-7 Section 3.4. Revised Safety Review and Audit Board description to reflect present technical specification. Changes do not represent a reduction in the approved Quality Assurance program commitment.

- Page 3-7 Section 3.5. Revised Station Operations Review Committee description to reflect the present technical specification. Changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 3-8 Minutes of SORC meeting will be recorded and copies of minutes will be forwarded to the Assistant General Manager - Nuclear and the Technical Staff Manager. Does not represent a reduction in the approved Quality Assurance program commitment.
- Page 3-10 Revised Table 3 to represent changes in organization. Also, revised SRAB Audit responsibilities to reflect current technical specification requirements. Changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 3-10A Revised Figure 2 to represent the new nuclear organization. The above changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 4-1 Sixth paragraph. Titles changed from "Division Manager of Licensing and Quality Assurance" to "Division Manager - Quality Assurance" to represent new organization.
- Last two (2) paragraphs. Title changed from "CNS QA Supervisor" to "CNS QA Manager" and "QA Department" to "QA Division". The above changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 4-2 First and second paragraphs. Title changed from "Cooper Nuclear Station Superintendent" to "Cooper Nuclear Station Management" and "CNS Quality Assurance Supervisor" to "CNS Quality Assurance Manager". Changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 4-3 First paragraph. Title change from "Division Manager of Licensing and Quality Assurance" to "Division Manager of Quality Assurance" to reflect new organization.
- Last paragraph, sentence clarification. Since Cooper Nuclear Station has been in operation for approximately 10 years, the existing program has been developed and approved. All future preparation of Quality Assurance documents should be associated with on-going program development or revision. The above changes do not represent a reduction in the approved Quality Assurance program commitment.
- Page 4-4 First paragraph. Same as above.
- Page 4-5 Second paragraph. Title changes. Deleted Station Superintendent, Senior Division Manager, Power Operations and Power Projects. Added Division Manager - Nuclear Operations and Division Manager - Nuclear Services. These changes do not represent a reduction in the approved Quality Assurance program commitment.



Page 4-6 First paragraph. Title change per reorganization. No reduction in the approved Quality Assurance program commitment.

Page 5-1 Second paragraph. "The CNS Quality Assurance Manager has been delegated the responsibility for reviewing CNS procedures" to increase program effectiveness.

Third paragraph. Added "the CNS or General Office Quality Assurance Managers shall prepare."

Fourth paragraph. Title change. Division Manager of Licensing and Quality Assurance to Division Manager of Quality Assurance.

Sixth paragraph. "Yearly audit summary reports will be submitted to the Assistant General Manager - Nuclear by the Division Manager of Quality Assurance." The above changes do not represent a reduction in the approved Quality Assurance program commitment.

Page 6-1 First paragraph. Changed Quality Assurance Manager to Quality Assurance Staff to provide more input into the program. Change does not represent a reduction in the approved Quality Assurance program commitment.

Page 8-9 ANSI N45.2.9 Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants

One-hour fire rated file cabinets have been procured for the temporary storage of working files at CNS. The two-year time limit for working files will be periodically audited by Quality Assurance for expeditious transmittal of older records to the permanent storage facility. The District takes exception to paragraph 5.6 of ANSI N45.2.9-1974, relative to storage facilities for temporary records. The exception is not considered to be a reduction in the District's approved QA Program.

In Reply Refer To:  
Docket: 50-298

Nebraska Public Power District  
ATTN: J. M. Pilant, Manager, Technical  
Staff-Nuclear Power Group P.O. Box 499  
Columbus, Nebraska 68601

Gentlemen:

We have completed our review of Revision 1 to Appendix D of the Cooper Nuclear Station (CNS) Updated Safety Analysis Report (USAR), "Cooper Nuclear Station Quality Assurance Program for Operation," as submitted by your letter dated March 5, 1984, and modified by your letter dated August 13, 1984.

We find two areas of concern in the subject revision, design control, and quality assurance records. These concerns are discussed below:

1. Design Control of "Commercial Grade" Spare Parts

Section 2.3, "Design Control," was changed by Revision 1. A review of that section shows that it does not clearly define design control required for "commercial grade" spare and replacement parts used in safety-related (essential grade) applications.

In some cases, an original "commercial grade" part may have been purchased from a manufacturer who did not have a quality assurance program meeting 10 CFR 50, Appendix B; and design control, including qualification of material substitutions, was not invoked. Apparently, these commercial parts were qualified, either by testing or analysis, by the architect engineer (AE) or the Nuclear Steam System Supplier (NSSS).

In these cases, replacement parts purchased by you may be the same in form, fit, and commercial function; however, they are not considered qualified for a safety-related function, per se, based on a model number or some other commercial designation.

Verification must be performed to insure that the part utilized for safety-related applications are functionally the same as the part originally qualified. This verification may consist of qualification by testing and analysis, such as by lot qualification test, or other definitive, auditable, documented, qualification. This qualification must be performed at the time the "commercial grade" part is "dedicated" for safety-related use (basic component), and before return to service (operability).

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EHJohnson  
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2. Quality Assurance Records

Revision 1 changed Section 2.17, "Quality Assurance Records." The section marked as being revised indicates that the CNS records management system is based on duplicate records. Certain required records, such as radiographic film, are not duplicated. Your quality assurance program must address these records also.

Section 8.9(b), which discussed ANSI N45.2.9 and Regulatory Guide 1.88, and CNS implementation has been changed. Revision 1 takes exception to ANSI N45.2.9 for storage of temporary records, and proposes such storage in one (1) hour Class 350 UL fire rated file cabinets.

This change has been discussed with the NRC Quality Assurance Branch. To be acceptable to NRC, this section must limit the use of the subject file cabinets to fire resistive buildings which have a fire loading that is within the limits of Table 5533 of the National Fire Code.

Original Signed By

E. H. Johnson

E. H. Johnson, Chief  
Reactor Project Branch 1

cc:  
Paul V. Thomason, Division Manager  
of Nuclear Operations  
Cooper Nuclear Station  
P.O. Box 98  
Brownville, Nebraska 68321

bcc to DMB (IE01)

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