

October 10, 2002

Mr. David L. Wilson
Vice President of Nuclear Energy
Nebraska Public Power District
P. O. Box 98
Brownville, NE 68321

SUBJECT: REVIEW OF COOPER NUCLEAR STATION QUALITY ASSURANCE
PROGRAM PLAN CHANGES (TAC NO. MB6271)

Dear Mr. Wilson:

By a letter dated June 21, 2002, Nebraska Public Power District submitted changes to the quality assurance program for the Cooper Nuclear Station in accordance with the provisions of Section 50.54(a) of Title 10 of the *Code of Federal Regulations* (10 CFR). Pursuant to 10 CFR 50.54(a)(4), the licensee identified in Table 1 of the submittal, changes that constitute a reduction in commitment and, therefore, require U. S. Nuclear Regulatory Commission (NRC) approval prior to implementation. These changes reduce the level of detail of some commitments in the Quality Assurance Program for Operation Policy Document.

The NRC staff has reviewed the changes identified in Table1, and finds that the stated reductions in commitments continue to satisfy the applicable standards and regulations and, therefore, are acceptable. The review and bases for finding the proposed alternatives to be acceptable are documented in the enclosed safety evaluation.

If you have any questions, please contact me at (301) 415-1476.

Sincerely,

/RA/

Mohan C. Thadani, Senior Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosure: As stated

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED REVISION 14b TO THE QUALITY ASSURANCE PROGRAM

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NUMBER 50-298

1.0 INTRODUCTION

By letter dated June 21, 2002, Nebraska Public Power District (the licensee) submitted changes to the quality assurance program for the Cooper Nuclear Station. Some of the changes constitute reductions in commitments of 50.54(a)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR), which require U.S. Nuclear Regulatory Commission (NRC) staff review and approval. These changes reduce the level of detail of some commitments in the Quality Assurance (QA) Program for Operation Policy Document (QA Program). The licensee is making these changes to improve readability, eliminate unnecessary redundancy, and clarify commitments.

2.0 TECHNICAL EVALUATION

Definitions

The ANSI N45.2.10-1973, "Quality Assurance Terms and Definitions," is applicable to the CNS QA Program.

In Section 1.3, paragraph 1(a), the licensee proposes to make minor changes to definitions found in ANSI Standard N45.2.10-1973 for lower tier procedures. The ANSI Standard N45.2.10-1973 definitions are used for the purposes of the QA Program. The proposed differences in definitions used in procedures are minor in nature and still meet the intent and scope of the applicable ANSI standards.

The ANSI N45.2.12-1997, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants," Section 3.5.2, states that audits shall be frequently scheduled. No specific periodicity is given.

In Section 1.3.29 the licensee proposes to revise the definition for Quality Assurance Plan (QAP). The QAP procedures will not provide detailed requirements for a given functional area, but will include scope and frequency for the audit function. Relocation of certain requirements regarding functional areas to lower tier procedures does not represent a reduction in commitments to standards.

The ANSI N45.2.10-1973, "Quality Assurance Terms and Definitions," Section 2 states the definition for a "contractor."

In Section 2.1.9, the licensee proposes to refer to any outside contractor, supplier, consultant, etc., simply as "contractor." This does not represent a change in commitment from the standard.

The 10 CFR 50.54, "Conditions of Licenses," permits the use of generic organizational position titles.

In Section 2.1, the licensee deleted the specific titles and descriptions of senior managers and used more generic descriptions. This is consistent with 10 CFR 50.54.

Temporary Procedures

The ANSI N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," Section 5.2.2 states that as a minimum, temporary procedure changes be reviewed by two members of the plant staff knowledgeable in the areas affected by the procedures. At least one of these individuals shall be the supervisor in charge of the shift and hold a senior operator's license.

In Section 2.1.8.2, the licensee proposes that temporary procedure changes be reviewed by the Station Operations Review Committee, subsequent to the review by the plant staff. This task was accomplished by the Plant Manager. This is consistent with the temporary procedures requirements.

Policies and Guidelines

The regulation at 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," and ANSI N45.2-1977, "Quality Assurance Program Requirements for Nuclear Facilities," state that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances. Measures shall be established to assure that documents, including changes, are reviewed for adequacy.

In Section 2.5, the licensee proposes to establish a document hierarchy. Policies and Guidelines involve documents governing corporate or business practices, which are not considered within the scope of the QA Program. Activities subject to the requirements of 10 CFR Part 50, Appendix B continue to be within the scope of the QA Program.

Activities Covered by Audits

Appendix B Criterion X, "Inspection," states that a program for inspection of activities affecting quality shall be established, and Appendix B Criterion XVIII, "Audits," states that a comprehensive system of planned and periodic audits shall be carried out. Neither criterion states specific examples of activities to be observed.

In Section 2.10, the licensee proposes to delete the types of activities covered by audits and surveillances. The activities continue to be monitored and are discussed in lower tier procedures. This level of detail is not required by the QA Program description and may be covered by lower tier procedures.

In Section 2.18 the licensee proposes to move detailed information on the conduct of audits to lower tier documents. This level of detail is not needed in the QA program description.

In Section 2.18 the licensee proposed to delete the discussion that surveillances are not intended to duplicate QC functions. This level of detail is not required by the QA Program description.

Nonconforming Items

The ANSI N45.2-1977, "Quality Assurance Program Requirements for Nuclear Facilities," Section 16, states that the responsibility and authority for the disposition of nonconforming items shall be defined.

In Section 2.15, the licensee proposes to relocate the details of how nonconformances are dispositioned to lower tier documents. This change involves removal that QA staff review every nonconforming item, regardless of significance. This level of detail need not be covered in the QA program.

NRC Interfaces

There is no direct regulation or standard pertaining to which licensee representative should interface with the NRC. Generally, this is viewed as a function of the licensing organization. The licensee proposes changes in how licensee staff interface with the NRC. This is primarily a licensing organization function and not a QA organization function.

Inspections

Appendix B Criterion X, "Inspection," states that a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawing for accomplishing the activity.

In Section 2.10, the licensee proposes to relocate specific instructions for the QA program to lower tier documents. This level of detail that is prescribed by the implementing procedure is consistent with Appendix B and applicable ANSI standard requirements.

3.0 CONCLUSION

The proposed alternatives are acceptable, in that the QA program continues to satisfy the requirements of 10 CFR Part 50, Appendix B, and applicable regulations and standards.

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