

NEBRASKA PUBLIC POWER DISTRICT
COOPER NUCLEAR STATION
QUALITY ASSURANCE PROGRAM FOR OPERATION
POLICY DOCUMENT

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Note: The above ANSI Standards and corresponding Regulatory Guides will serve as the baseline for NPPD commitment to NRC publications WASH-1283 (5-24-74), WASH-1284 (10-26-73) and WASH-1309 (5-10-74). Reference to ANSI Standards or Regulatory Guides in the Quality Assurance Program or implementing procedures will apply to the revision or issue date as noted above.

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8.0 Implementation, WASH-1283, -1284 and -1309

The CNS QA Program for Plant Operations will utilize the guidance provided by NRC publications WASH-1283 (5-24-74), WASH-1284 (10-26-73) and WASH-1309 (5-10-74) ("rainbow" series) except as noted in the "Specific Exceptions" of this section.

The existing operational QA Program does not address all of the detailed requirements set forth in the "rainbow books". A detailed review has been made to determine where the CNS QA Program differs from the ANSI Standards cited in the "rainbow books".

With respect to the applicability of the "rainbow books" and the associated standards, it is impracticable to apply all of the requirements set forth by these documents to a plant for which important, and (in some respects) irreversible commitments were made 8 to 10 years ago. It is also impracticable to apply requirements to an operating plant which were intended solely for the design and construction phase. NPPD does not now envision any major structural modifications or additions to Cooper Nuclear Station. In the event that any such construction were undertaken, the District would commit to compliance with the applicable portions of the WASH Series ANSI Standards. It is NPPD's intent to apply quality standards to maintenance, repair, and modification activities which will provide results which are equal to or better than the original construction.

The following sections summarize the scope and applicability of ANSI Standards and describe specific exceptions that will be taken in applying the guidance of these documents to the CNS QA Program.

8.1 ANSI N45.2 Quality Assurance Program Requirements for Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guides 1.28 and 1.33 shall be applied to the Operational QA Program to those activities affecting the safety-related aspects of the operational phase of CNS.

Where codes or standards are referenced, or are incorporated into the standard by reference, which are in conflict with original design commitments as set forth in the SAR, the SAR commitments shall govern. Later revisions of applicable codes and standards may be specifically invoked by the design requirements where deemed appropriate, consistent with the overall commitment to maintain the plant in an "equal to or better than" original condition.

(b) Specific Exceptions

Quality Assurance Program (Section 2)

The QA Program describes the measures utilized to comply with the requirements of 10CFR50 Appendix B. The CNS QA Program conforms to this ANSI Standard also, except as noted below.

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Inspection (Section 11)

First Level inspection has been assigned to plant personnel. Contrary to the requirement of this standard that such persons shall not report directly to the same immediate supervisor, our program requires only that inspection activities to verify quality of work shall be performed by appropriately qualified persons other than those who performed the activity being inspected. To be considered qualified, persons performing inspection or verification activities shall meet the following requirements:

- 1) The inspector or verifier did not perform or directly supervise the work.
- 2) The quality of work will be demonstrated by a functional test if a pressure boundary has been breached.
- 3) The verifier's qualifications are reviewed and found acceptable by the QA organization prior to initiating the verification.
- 4) Individuals performing verification functions associated with normal operations of the plant will be qualified to ANSI N18.1-1971.
- 5) Individuals whose qualifications are not required to meet those in ANSI N18.1-1971 and who performs verification activities shall be qualified to ANSI N45.2.6-1973 except that the QA experience cited for Levels I, II and III shall be interpreted to mean actual experience in carrying out the types of inspection, examination and testing activity being performed.
- 6) All non-destructive examinations (radiography, dye penetrant, magnetic particle, and the like) will be performed by personnel qualified and certified in accordance with SNT-TC-1A.

8.2 ANSI N45.2.1 Cleaning of Fluid Systems and Associated Components During the Construction Phase of Nuclear Power Plants

(a) Scope and General Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.37 shall be applied to safety-related maintenance, repair, and modification activities occurring during the operational phase of Cooper Nuclear Station except as noted below.

(b) Specific Exceptions

General Requirements (Section 2)

Cleaning requirements for almost all maintenance, repair and modification work will be considered as a part of the overall job requirements. In this respect, detailed cleaning procedures will not generally be prepared as separate documents. Necessary requirements, consistent with the scope of the work, will be included as a part

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of the overall work instructions. System cleanness is controlled at CNS by the following methods:

- 1) Parts and components are checked for cleanness during receipt inspection and stored in a manner that will ensure adequate levels of cleanness are being maintained.
- 2) Parts and components are inspected for cleanness prior to installation in accordance with CNS maintenance procedures.
- 3) The work area is maintained at a cleanliness level appropriate to the maintenance or modification activity being performed.
- 4) Quality Control inspections before, during and after safety-related maintenance or modification activities address system cleanness.
- 5) Random QA audit and surveillance of safety-related maintenance or modification activities requires verification of part, component and system cleanness.

Criteria for Cleaning (Section 3)

For cleanness classifications where the scope of plant modification work is such as to make application of the guidance provided by this standard practicable, the cleanness classifications and requirements thereof shall be evaluated and applied as a part of the overall work requirements.

For modification or maintenance work involving only small portions or individual components of larger systems, it is not considered practicable to conduct cleanness tests with ASTM E11-70 Series. Appropriate cleanness will be maintained during the work and preoperational flushing will be conducted, consistent with the scope of the work performed and the original design requirements. Flushing is an additional precaution to insure system cleanness. Controlling the parts and components and the work area has provided CNS with reasonable levels of assurance that system cleanness will be maintained. In addition to the above, the Water Chemistry Department routinely samples and tests for system cleanliness, corrosion, crud build-up etc.

8.3 ANSI N45.2.2 Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (During the Construction Phase)

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.38 shall be applied to packaging, shipping, receiving, storage and handling activities associated with safety-related items except as noted below.

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(b) Specific Exception

Our program is structured to identify safety-related equipment and provide for designation of packaging, shipping, receiving, storage and handling requirements for purchased parts and materials. The classifications of this standard cannot be applied directly to individual spare parts or subassemblies of the parent equipment. Due to difference in volume, complexity, inspectability, etc., the packaging, shipping, handling and storage requirements of spare parts and subassemblies will necessarily be different from the requirements which may be imposed on the entire component or piece of parent equipment.

The majority of items purchased for an operating plant consist of components, subassemblies and individual spare parts which could be used in a multitude of different applications. Such items are purchased to the highest requirement of intended use. The volume and characteristics of purchases during the operational phase differ significantly from those purchases made during the design and construction phase, and storage facilities are considerably different. Items that require special measures of storage protection will be identified as a part of the purchasing documents. Items that must be stored outdoors (equivalent of Level D) or items that must be stored in covered but unheated conditions (equivalent of Level C) will be evaluated on an individual case basis. However, it is not considered practicable to preclassify individual parts by levels as required by Section 2.7 of this standard. Shipping and packaging requirements for such items will likewise be handled in the purchase order documents.

(c) Implementation

The NPPD procurement procedures for safety-related items includes a checklist to verify that the ANSI N45.2.2 requirements for packing, shipping, receiving, storage and handling are included in the procurement document. QA audits and surveillance are performed to verify that the requirements of N45.2.2 are met except as noted in (b) above.

8.4 ANSI N45.2.3 Housekeeping During the Construction Phase of Nuclear Power Plants

(a) Scope and General Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.39 for control of housekeeping requirements shall be applied to work conditions and other applicable activities which could affect quality of important operational aspects of CNS except as noted below.

(b) Specific Exceptions

General Requirements (Section 2)

The plant has been divided in zones for fire protection and security purposes. The zone designated for cleanness in the ANSI Standard

are primarily intended for control or work during construction of the plant. Therefore, the CNS facilities will not be classified by the zones designated in the Standard general housekeeping rules. Limitations on eating, drinking, and smoking are already provided in existing CNS procedures. Where special cleanness controls, tool and material accountability are required for particular types of work, temporary clean areas will be designated and defined in the procedures for accomplishing the work.

Requirements (Section 3)

Fire protection and prevention equipment will be provided as set forth in accordance with NPPD evaluation of the CNS fire protection system as submitted to the NRC on 10/17/76 and 4/6/77.

(c) Implementation

Existing maintenance procedures will be reviewed to determine the need for particular cleanness, housekeeping and control provisions. Where indicated, procedures will be revised to incorporate such provisions, using the guidance of ANSI N45.2.3. Appropriate maintenance procedures will be updated using these guidelines by July 1979.

8.5 ANSI N45.2.4 Installation, Inspection and Testing Requirements for Instrumentation and Electric Equipment During the Construction Phase of Nuclear Power Generating Stations

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.30 shall be applied to installation, inspection and testing of electrical equipment and systems associated with on-site safety-related modification work occurring during the operational phase of CNS except as noted below.

Where specific design requirements included in this standard or referenced codes and standards are in conflict with original design requirements set forth in the SAR and other appropriate design documents, the original design requirements shall govern.

(b) Specific Exceptions

Definitions (Section 1.4)

The definition of Class I and Class IE electrical equipment set forth by this standard does not conform to the equipment categories of CNS. Essential electrical items upon which the Operational QA Program is based are included in the SAR Amendment 39. The scope and applicability of this standard shall necessarily be limited to these defined areas.

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Procedures and Instructions (Section 2.3)

Appropriate requirements for installation, inspection and tests will be set forth by job specifications and work instructions developed as a part of the modification work package. It is not intended that separate procedures be established which specifically address the various areas of this standard. However, in the development of the work package, consideration will be given to the areas outlined in Section 2.3.

Installation, Verification and Test (Section 4.0, 5.0 and 6.0)

The requirements of the installation and the associated inspections, verifications and tests are included in the work instructions as appropriate, consistent with the scope of the work and the importance of quality. In the development of the work instructions, consideration will be given to the guidance provided by Sections 4.0, 5.0 and 6.0 of this standard, and appropriate requirements will be incorporated into the instructions. It is not intended that separate procedures be established which specifically address all of the areas referenced.

Applicable Codes, Standards and Guides (Section 9.0 and Appendix B)

Application of the guidance provided by the additional codes and standards listed in Appendix B will be considered to the extent that such codes and standards provide useful and practical guidance for the work being performed.

8.6 ANSI N45.2.5 Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.94 shall be applied to activities involving safety-related concrete and structural steel work occurring during the operational phase of Cooper Nuclear Station except as noted below.

(b) Specific Exceptions

Procedures and Instructions (Section 2.2)

Appropriate requirements for installation, inspection and tests will be set forth by job specifications and work instructions developed as a part of the modification work package. It is not intended that separate procedures be established which specifically address the various areas of this standard. However, in the development of the work package, consideration will be given to the areas outlined in Section 2.2.

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Personnel Qualifications (Section 2.4)

The Operational QA Program includes provisions for ensuring that qualified personnel are assigned to monitor work activities. Refer to Section 8.7, Page D-9-86.

Calibration and Control (Section 2.5.2)

The requirements of control and calibration of measuring and test equipment set forth by this standard shall be applied to all measuring and test equipment used by NPPD or their agents, test laboratories and contractors. Such requirements, however, will not be imposed on commercial batch plant facilities. Instrumentation at commercial batch plant facilities will be evaluated to determine that sufficient accuracy can be obtained.

Qualification Tests (Section 3.2.1)

For small quantities of concrete involved in modification work, all concrete must be purchased from commercial concrete batch plants. For small quantities of concrete, it is unreasonable to expect commercial facilities to shut down normal operations to provide certified aggregate, cement, admixtures, fly ash, water, etc. In this respect, the qualification tests required by Table A for aggregate; cement; admixtures; fly ash and pozzolans; water and ice will not be required. Appropriate evaluations will be made to determine that good quality and generally acceptable materials are used. This evaluation, coupled with slump tests, air entrainment tests and concrete cylinder strengths, will provide adequate control and qualification of the concrete.

Design mixes consistent with, or equivalent to, original requirements will be specified and the results of the cylinder tests will be evaluated based on the acceptance criteria associated with the original design mix requirements.

Protection of Materials (Section 4.2)

The inspection requirements of Section 4.2 will not generally be performed, as the small quantities of concrete involved in modification work will no doubt be mixed using materials already in the batch plant bins. Control of storage of materials would not be practicable.

Measuring, Mixing and Transporting (Section 4.3)

If available, appropriate certifications shall be obtained from the concrete supplier which verify the adequacy of truck mixers per the requirements of ACI-304, ASTM C-94. Where certifications are not available, two concrete test cylinders representing the first and last one-third of truck mixer contents shall be taken for evaluation of the mixer truck, over and above the normal concrete cylinders taken to evaluate the in-place concrete. The concrete batch plant facility shall be inspected to assure that reasonable controls are being exer-

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cised with reference to the inspection guidelines set forth by Section 4.3(1) and (2).

Preplacement Preparation (Section 4.4)

Inspection of sils and earthwork will meet the general requirements set forth. The extent to which individual inspection requirements are met will depend upon the nature and scope of the work to be performed.

In-Process Tests on Concrete and Reinforcing Steel (Section 4.8)

Except for normal batch qualification tests (slump, air content, temperature and compressive strength) and initial reinforcing steel certifications, the in-process tests required by Table B are generally applicable to the periodic control which must be exercised with reference to long-term construction type programs. The in-process test requirements of Table J are not considered applicable to short-term modification work as would be required by QA at CNS.

(c) Implementation

Where the need arises, measures will be implemented to meet this standard with the exceptions noted above.

8.7 ANSI N45.2.6 Qualification of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.58 shall be applied to inspection, examination and testing activities associated with safety-related operations, including maintenance, repair and modification except as noted below.

(b) Specific Exceptions

It has always been the belief of CNS and NPPD that, in order to be effective, quality control must be built into the operation of the plant. With this in mind, CNS incorporated quality control inspection and test functions directly into the station operating procedures. Inspection points are then witnessed and signed-off by members of the operating staff not directly involved in the activity being inspected. Assignment of QC inspectors is a function of station management. The majority of the QC inspections are assigned to engineers, licensed reactor operators or lead technicians. This method for selecting and assigning inspectors has assured station management that the best qualified individual (either through education or years of experience) is assigned to monitor "essential" or safety-related activities. Inspectors will meet the requirements listed in paragraph 8.1 (of this amendment) under the part titled "Inspection".

The method endorsed by ANSI N45.2.6 places emphasis on certifying individuals and establishing levels of qualification. It is our contention that even though an individual is certified and qualified to the appropriate level, he may not be the best inspector in all situations.

The current method of selecting and assigning QC inspectors at CNS has proven to be very effective. We therefore take exception to Sections 2.0 and 3.0 of ANSI N45.2.6. If future operation indicates that our present system is inadequate, the Station Operating Review Committee will reevaluate the QC system and commit to ANSI N45.2.6 or provide an acceptable alternate.

CNS does not have the in-house capability to perform nondestructive examinations in accordance with SNT-TC-1A. These services are currently contracted to an approved vendor. Any required nondestructive examinations will be performed by personnel who are qualified and certified per SNT-TC-1A.

8.8 ANSI N45.2.8 Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard shall be applied to installation, inspection and testing of mechanical equipment and systems associated with on-site safety-related modification work occurring during the operational phase of CNS.

Where specific design requirements included in this standard or referenced codes and standards are in conflict with original design requirements set forth in the SAR and other appropriate design documents, the original design requirements shall govern.

8.9 ANSI N45.2.9 Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.88 shall be applied to quality assurance records associated with the operational phase of CNS.

For those design, manufacturing, construction and operating records generated prior to implementation of this standard, it is not our intent to backfit the detailed requirements of this standard to those records. All such records, however, have been initially designated for lifetime storage, until specific review dictates otherwise, and will be stored in the permanent record storage facility. Appropriate record indexes and filing system shall be established to permit reasonable identification and retrieval. The records will be stored and preserved per the requirements of Section 5.0 of this standard.

8.10 ANSI N45.2.10 Quality Assurance Terms and Definitions

(a) Scope and Applicability

The quality assurance terms and definitions contained in this standard shall be used as guidance and applied as appropriate to the Operational QA Program for CNS.

The use of this standard and the associated Regulatory Guide 1.74 shall be effective immediately. There may be instances where existing procedures contain definitions that may not be in strict accordance with those provided by this standard. As existing procedures are revised, however, such definitions shall be evaluated to determine if all definitions meet those provided by this standard.

8.11 ANSI N45.2.11 Quality Assurance Requirements for Design of Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.64 shall be applied to design activities involving safety-related modification work and the revision or development of plant design documents occurring during the operational phase of CNS.

Where codes, standards or design requirements are referenced, or are incorporated into the standard by reference, which are in conflict with original design commitments as set forth in the SAR, the SAR commitments shall govern. Later revisions of applicable codes and standards may be specifically invoked by the design requirements where deemed appropriate, consistent with the overall commitment to maintain the plant in an "equal to or better than" original condition.

8.12 ANSI N45.2.12 - 1974 Requirements for Auditing of Quality Assurance Programs for Nuclear Plants

(a) Scope and Applicability

Except as expressly modified below, the guidance provided by this standard shall be applied to the audit program identified by the Operational QA Program for CNS.

All of the QA Program elements will be audited at least once every year in accordance with the guidance provided in Regulatory Guide 1.33.

(b) Specific Exceptions

Follow-up (4.5.1)

The audited organization is required by existing procedures to respond in writing to deficiencies noted in the audit report. A minimum response time is not specified because corrective action varies depend-

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ing on the nature and extent of the deficiency. However, corrective action is subject to follow-up audits and reports to higher management within eight (8) weeks of issuance of the original audit report.

8.13 ANSI N45.2.13 - Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants

(a) Scope and Applicability

The guidance provided by this standard shall be applied to the procurement of safety-related parts, components, materials and services during the operational phase of CNS.

(b) Specific Exceptions

It must be recognized, however, that equipment and components purchased during the design and construction phase were not purchased on the basis of present-day standards, especially with reference to vendor qualification and vendor quality assurance programs. In this respect, replacement parts and spare parts for existing equipment are often limited to sole-source suppliers. Such replacement parts or spare parts are purchased to appropriate quality standards to maintain an "equal to or better than" condition but it is not considered practicable to backfit the requirements of the standards to all such vendors.

8.14 ANSI N18.1 - 1971 Selection and Training of Nuclear Power Plant Personnel

(a) Scope and Applicability

The guidance provided by this standard shall be applied to the selection and training of personnel at CNS.

8.15 ANSI N18.7 - 1972 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

(a) Scope and Applicability

The operational QA Program for CNS conforms to the guidance provided by this standard and the associated Regulatory Guide 1.33 excepted as noted below.

(b) Specific Exceptions

Where ANSI N18.7 - 1972 parallels the requirements of ANSI N45.2 through ANSI N45.2.13, exceptions taken shall be applicable to this standard as well.

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REVIEW GUIDE

In order to aid the NRC staff members during their review process of additional information concerning Section 8.0 to Amendment 39, a brief summary of each of the staff request and the respective response by NPPD is outlined in this enclosures.

Question 20

- 1) The "Table of Contents" (Page iii) has been revised to reflect the ANSI Standard and the corresponding Regulatory Guide contained in WASH-1283, -1284 and/or -1309. A statement was added to establish a baseline for CNS commitment. As discussed in the meeting, future revision to this section of the QA Program will be initiated via letter to the Commission requesting the change.
- 2) Commitment to Regulatory Guide 1.33 is contained in the index, Section 8.1 and Section 8.15 of the QA Program.

Question 21

All the words and phrases such as:

- "To the extent that"
- "It is not intended that the QA Program address all the detailed guidance"
- "The intent of"

have been removed from this section of the QA Program. A commitment has been made to conform to the Regulatory Guide and corresponding ANSI Standard except as noted.

This response applies to Questions 23, 30, 35, 37 and 44.

Question 22

NPPD has endorsed the NRC staff position as stated in Question 32. This staff position and corresponding NPPD commitment is located under Section 8.1, Subsection (b) - Specific Exceptions.

This response also applies to Question 32. Section 8.7 references Section 8.1 which endorses the NRC staff position.

Question 23

Examples noted in this question were revised to provide a clear commitment to the ANSI Standard and corresponding Regulatory Guides, except as noted. (Refer to Question 21.)

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Question 24

The AQ Program was revised to describe the methods used by NPPD to ensure cleaning requirements and access control are considered in the overall work requirements. Refer to Section 8.2, Subsection (b).

Question 25

This question is an extension of Question 24 and is also addressed in Section 8.2, Subsection (b) - Criteria for Cleaning.

Question 26

The QA Program was revised to provide assurance that review of purchase order documents considers any special packaging, shipping, receiving, storage and handling which may be required. Refer to Section 8.3, Subsection (b).

Question 27

- 1) The requested completion date can be found in Section 8.4, Subsection (c) - Implementation.
- 2) Commitment to ANSI N45.2.3 is contained in Section 8.4, Subsection (a).

Question 28

The two examples noted were typing errors and have been corrected. Refer to Section 8.6, Subsection (a) and Section 8.7, Subsection (b).

Question 29

Section 8.6 has been revised to provide the information requested.

Question 30

Section 8.6, Subsection (c) - Implementation was revised and the words "the intent of" deleted. Refer to Question 21.

Question 31

Section 8.7, Subsection (a) was revised as agreed upon in the meeting.

Question 32

Refer to Question 22.

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Question 33

Section 8.8, Subsection (a), second paragraph was revised to refer to mechanical equipment instead of electrical equipment.

Question 34

Reference to an implementation date was deleted from Section 8.9, Subsection (a). NPPD is currently in compliance with this standard and corresponding Regulatory Guide.

Question 35

Section 8.10, Subsection (b) was revised and words "the intent of" were deleted. Refer to Question 21.

Question 36

Section 8.12, Subsection (b) was revised to reflect the current auditing schedule of CNS.

Question 37

Section 8.0 of the QA Program was revised to provide a clear commitment to the NRC "Rainbow Books" except as noted. A baseline was established consistent with the issue date of Regulatory Guides contained in the "Rainbow Books". Refer to Question 21.

Questions 38, 39, 40, 41

It was established during the meeting that NPPD's interpretation of ANSI N45.2.13 was too restrictive. The current method of evaluating procurement sources, bid evaluations and preaward evaluations complies with ANSI N45.2.13. Therefore Section 8.13 was revised and the Specific Exceptions section was deleted.

Question 42

Section 8.15 was revised to provide a clear commitment to ANSI N18.7 except as noted.

Question 43

Sections 8.1, Subsection (b) and 8.7 Subsection (b) were revised to include a statement that NDE shall be performed by personnel qualified and certified to SNT-TC-1A.

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Question 44

Section 8 of the QA Program was purged of the caveat in question. The NRC staff position, therefore, no longer applied.

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