

# Nebraska Public Power District

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

June 25, 1981



Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Qualification of Inspection, Examination and  
Testing and Audit Personnel (Generic Letter 81-01)

Dear Mr. Eisenhut:

In response to your recent directive "Qualification of Inspection, Examination, and Testing and Audit Personnel (Generic Letter 81-01)" dated May 4, 1981, the following is presented:

Regulatory Guide 1.146 - Qualification of Quality Assurance Program  
Audit Personnel for Nuclear Power Plants - dated August 1980

Response:

Presently, Nebraska Public Power District auditor's qualification program is in compliance with the guidelines established in ANSI/ASME N45.2.23-1978 for qualifying personnel that participate in audits of quality assurance programs for nuclear power plants. Cognizant of the continuing industry shortage of Lead Auditors, the District QA Department has established an on-going auditor's training program. During the interim period, auditors who are not certified to ANSI/ASME N45.2.23-1978 are under the direction of qualified Lead Auditors. In order to provide objective evidence of Lead Auditor direction to all CNS QA program auditors, the co-signature of a Lead Auditor is required on all audit reports and follow-ups performed by auditors.

Regulatory Guide 1.58 Revision I - Qualification of Nuclear Power Plant  
Inspection, Examination, and Testing Personnel

Response:

NPPD's commitment to ANSI N45.2.6 "Qualification of Inspection, Examination and Testing Personnel for Nuclear Power Plants" stated in section 8 of the Cooper Nuclear Station Quality Assurance Program Policy Document, Revision 8, is as follows:

Scope and Applicability

The guidance provided by this standard and the associated Regulatory Guide 1.58 shall be applied to inspection, examination, and testing

App  
5/10

activities associated with safety related operations, including maintenance, repair, and modification except as noted below.

#### 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 inspection and test functions directly into the station operating procedures. Inspection points are 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. CNS inspectors meet the requirements listed in the following section entitled "Inspection".

#### Inspection

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:

The inspector or verifier did not perform or directly supervise the work;

The quality of work will be demonstrated by a functional test if a pressure boundary has been breached;

The verifier's qualifications are reviewed and found acceptable by the QA organization prior to initiating the verification;

Individuals performing verification functions associated with normal operations of the plant will be qualified to ANSI N18.1-1971;

Individuals whose qualifications are not required to meet those in ANSI N18.1-1971 and who perform 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; and

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.

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 inhouse capability to perform non-destructive examinations in accordance with SNT-TC-1A. These services are currently contracted to an approved vendor. Any required non-destructive examinations will be performed by personnel who are qualified and certified per SNT-TC-1A.

#### Regulatory Positions C.5, 6, and 10

##### Response:

As reflected in NPPD's commitment to ANSI N45.2.6, specific exception has been taken to Sections 2.0 and 3.0. The alternative method of complying with the applicable sections of 10CFR50, Appendix B are as described in the commitment.

#### Regulatory Position C.7

##### Response:

As described in NPPD's commitment, adequate steps are taken to ensure an acceptable level of competence in the performance of their activities.

#### Regulatory Position C.8

##### Response:

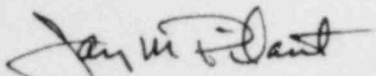
Inspection activities at CNS are prescribed by work documents and procedures which are reviewed and approved by appropriate station management. These reviews include specific dedication to the aspect of radiological concerns such that it is addressed when appropriate for each circumstance. In addition to the work procedures, station administrative controls are commensurate with federal regulations.

CNS Health Physics Procedure 9.1.1.1 states that radiation protection training will be oriented to the activity to be performed by the individual as determined by the Health Physics Department.

Darrell G. Eisenhut, Director  
June 25, 1981  
Page 4

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

Sincerely,



Jay M. Pilant  
Director of Licensing  
and Quality Assurance

JMP:FEW:cmk