

## Nebraska Public Power District

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

LQA8100071

November 17, 1981

Mr. G. L. Madsen, Chief  
Reactor Projects Branch  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/81-19

Dear Mr. Madsen:

This letter is written in response to your letter dated November 3, 1981, transmitting IE Inspection Report No. 50-298/81-19. You indicated that certain of our activities were not conducted in full compliance with NRC requirements.

Following is a statement of violation and our response in accordance with 10 CFR 2.201.

### Statement of Violation

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions.

Technical Specification for installation of torus saddles, NPPD Contract No. 80-28, Section G, Part IV, paragraph 6.4.2 requires that the weld overlay used on the torus shell shall extend 1/2 inch minimum beyond the toe of attachment welds.

Contrary to the above:

The NRC inspector observed, during a previous inspection on September 3, 1981, that areas on each of the four saddles inspected, saddles 8 through 11, did not satisfy the Technical Specification requirement, in that, the overlay extends less than 1/4 inch beyond the attachment weld toe.

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The NRC inspector determined on October 14, 1981, that the change in welding technique, from that specified in the Technical Specification, had not been authorized; and during this inspection, upgraded the unresolved item to a violation.

This is a Severity Level V violation (Supplement I.E.). (8119-01)

Corrective Steps Which Have Been Taken And The Results Achieved

Immediate steps were taken by the Project Engineer to evaluate the consequences of the stated violation. This evaluation revealed that;

1. The 1/2 inch tolerance between the toe of the weld and edge of the overlay was specified for dimensional tolerances and not for metallurgical reasons,
2. The lack of edge distance is not a cause for concern from the standpoint of load transfer,
3. The lack of edge distance is also judged not to be a cause for concern with respect to degradation of the material properties of the torus shell, provided the attachment weldment is located on the weld overlay and not on the torus shell.

The basis for this judgement was determined from the Production Test Assembly Results, wherein the results of the knoops micro-hardness tests demonstrated maintenance of good heat-affected-zone ductility in the weldment.

Based on the above considerations, the lack of the specified 1/2 inch edge distance on the weld overlay is considered to be an installation nonconformance (not adverse to quality).

Based on the evaluation, the installation nonconformance has been resolved by the contractor's issuance of their standard form "Request for Acceptance of Nonconformity as Deviation," (RAD #2). RAD #2 was subsequently approved by the Project Engineer on October 16, 1981.

Corrective Steps Which Will Be Taken To Avoid Further Violations

A letter is being issued to the Nuclear Engineering Department instructing them to assure that, in the future, all contract Technical Specifications are incorporated into the appropriate implementing procedures.

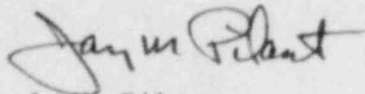
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Date When Full Compliance Will Be Achieved

We believe we are in full compliance upon the issuance of this response.

If you have any questions in regard to this response, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. M. Pilant".

J. M. Pilant  
Division Manager of  
Licensing and Quality Assurance

JMP:VLW:cg