UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUN 6 1994

Docket: 50-298
License: DPR-46

Nebraska Public Power District
ATTN: Guy R. Horn, Nuclear Power
Group Manager
P.O. Box 499
Columbus, Nebraska 68602-0499

SUBJECT: OPERATIONAL QUALITY ASSURANCE PROGRAM FOR COOPER NUCLEAR STATION

On April 5, 1994, you submitted, by your letter CNSS943113, changes addressed in Revision 10 to Cooper Nuclear Station's (CNS) Quality Assurance (QA) Program. Some of the changes appear to be a reduction in commitments included in the QA Program description previously accepted by the NRC. In accordance with 10 CFR 50.54(a)(3), changes that include a reduction must receive NRC approval prior to implementation. Therefore, additional information is needed for our review, as set forth in the enclosure to this letter.

The completion of our review of Revision 10 to the CNS QA program will depend on the receipt of satisfactory responses to the items in the enclosure.

Any questions you may have concerning this review should be directed to Mr. W. P. Ang of my staff at 510-975-0310.

Sincerely,

Thomas P. Gwynn, Director
Division of Reactor Safety

Enclosure: Request for Additional
Information

cc w/Enclosure:
Nebraska Public Power District
ATTN: G. D. Watson, General Counsel
P.O. Box 499
Columbus, Nebraska 68602-0499

Nebraska Public Power District
ATTN: Mr. David A. Whitman
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Columbus, Nebraska 68602-0499

IE43

Nebraska Department of Environmental
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ATTN: Randolph Wood, Director
P.O. Box 98922
Lincoln, Nebraska 68509-8922

Nemaha County Board of Commissioners
ATTN: Larry Bohlken, Chairman
Nemaha County Courthouse
1824 N Street
Auburn, Nebraska 68305

Nebraska Department of Health
ATTN: Harold Borchert, Director
Division of Radiological Health
301 Centennial Mall, South
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Lincoln, Nebraska 68509-5007

Department of Natural Resources
ATTN: R. A. Kucera, Department Director
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Kansas Radiation Control Program Director

bcc to DMB (IE43) DRS

bcc distrib. by RIV

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Leah Tremper, OC/LFDCB, MS: MNBB 4503
DRSS-FIPS
Project Engineer (DRP/C)
W. Wagner, RIV/WCFO
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K. Connaughton, NRR/PDIV-1
R. Gramm, NRR/LPEB
DRS AI 94-28

Resident Inspector
Branch Chief (DRP/TSS)
RIV File
B. Ang, RIV/WCFO

RIV:RI:PS	RI:PS	C:PS	DD:DRS	D:DRP	D:DRS
WWagner	RPate	WAng	JAMitchel	ABBeach	TPGwynn
6/2/94	6/2/94	6/2/94	6/16/94	6/16/94	6/17/94

Also review with Bob Gramm of NRR/LPEB

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6/2/94	6/2/94	6/2/94	6/6/94	6/6/94	6/7/94

Also review with R. Gramm of NRR/LPEB

ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION

We have reviewed Revision 10 to the CNS QA program which was submitted to us on April 5, 1994. As a result of our review we are requesting additional justification or clarification for the following Revision 10 changes:

PAGE	CHANGE/COMMENTS
1-19	Section 1.5 Definition of Terms: The term QA Instructions (QAIs) was deleted. Revision 9 stated that QAIs defined the responsibilities for implementation of the QA Program and, in addition, they provided guidance for surveillance and audit activities performed by the QA Staff. Revision 10 deleted this paragraph from the QA Program because these QAIs are being incorporated into the Nuclear Quality Procedures (NQPs). For this change to be acceptable, the definition of NQPs needs to include the responsibilities and guidance statements from the previously deleted definition of QAIs.
2-6	Section 2.3 Design Control: The third paragraph deleted the QA Division in-line review and independent evaluation of QA requirements of all design changes initiated for CNS. These in-line reviews/evaluations were replaced with reviews of randomly selected design changes by QA. CNS states that "by removing QA from this in-line review it will enhance the QA program via instilling QA principles to the line organization." CNS provides no justification to support this statement. Before deleting the in-line review of QA requirements of design changes by the QA Division, CNS should assure itself that this review can be replaced by a random audit program with no decrease in quality. For instance, CNS could collect data that would indicate whether these reviews are identifying design or procedure deficiencies. If the line organizations have demonstrated that they consistently produce high quality design change documents that met all the QA requirements, then a program that verifies that the high quality is maintained (i.e., pre-planned and random audits) would be justified. In addition, Revision 10 should include a commitment to reinstate the in-line review whenever the results of an alternate program (e.g., random audits) show an unacceptable quality level.
2-13	Section 2.4 Procurement Document Control: The third paragraph deleted the in-line responsibilities of QA review of essential and quality commercial grade purchasing documents. This represents a reduction in commitments which requires additional justification for our review. Refer to our comments for page 2-6.
2-16	Section 2.5 Instructions, Procedures, and Drawings: Deleted the in-line review of procedures by QA that address special processes,

special test procedures, and special maintenance procedures. This represents a reduction in commitments which requires additional justification for our review. Refer to our comments for page 2-6.

2-22 Section 2.9 Control of Special Processes: Sentence two deleted QA from the in-line review of general maintenance procedures that provide for performance of special processes. This represents a reduction in commitments which requires additional justification for our review. Refer to our comments for page 2-6.

2-31 Section 2.15 Nonconforming Materials, Parts, or Components: Deleted the sentence "Deficiencies and/or deviations identified by QA Staff personnel shall be reported on a Quality Assurance finding form." CNS says that deficiencies identified by QA will be documented per the Corrective Action Process (CAP); however, this is not addressed in this section of the QA Program.

3-8 Section 3.2.5 Quality Assurance Assessment Manager: Deleted the sentence "they shall also be responsible to perform scheduled surveillance within the General Office and verify that corrective action has been implemented." It is not clear if this function still exists or who currently has this responsibility.

The last sentence of this page was deleted stating, in part, that "the General Office Quality Assurance Manager shall act for the Division Manager of Quality Assurance in his absence." The justification provided for this deletion was that "this level of detail is not required to be in the Policy Document." This may be acceptable justification, but it still represents a reduction in commitments requiring NRC approval prior to implementation.

3-9 Section 3.2.7 Quality Assurance Staff: Deleted the first two paragraphs that identifies the "General Office Quality Assurance Staff" responsibilities. CNS said that these responsibilities will be under the direction of the QA Assessments Manager; however, it was not apparent that Revision 10 of the QA Program reassigned these responsibilities to the QA Assessments Manager.

3-11 Section 3.2.7 Quality Assurance Staff: Deleted section entitled "Secretary to the Division Manager of QA." The responsibilities and duties were shifted to the QA Managers secretary, however, this does not appear to have been included in Revision 10. Additional information is requested regarding where these responsibilities and duties were relocated in the QA Program Description.

3-12 Section 3.2.9 Site Manager: "Site Manager" was deleted and responsibilities were redistributed to Senior Management. Clarification is needed to describe how the responsibilities were assigned and where they are located in the QA Program Description. It's not clear where the Site Manager fitted into the hierarchy of the QA organization chart; this information is required for our

review to determine if responsibilities were redistributed to Senior Management of same or higher level.

3-15 Section 3.5 Safety Review and Audit Board (SRAB): Changed wording to generalize the responsibilities of SRAB to coincide with how the responsibilities are worded for Station Operations Review Committee (SORC) in Section 3.6. This change may require an amendment to the Technical Specifications.

3-17 Section 3.7 Outside Suppliers, Contractors, Subcontractors, and Consultants: Deleted the in-line review of procurement documents by QA. This represents a reduction in commitments which requires additional justification for our review. Refer to our comments for page 2-6.

4-1 Section 4.1 NPPD Internal Documents: Deleted in-line review of work procedures by QA. This represents a reduction in commitments which requires additional justification for our review. Refer to our comments for page 2-6.

4-2 Section 4.1.1 Quality Control Inspection: Deleted second paragraph requiring the QA Operations Manager to verify that QC inspections are incorporated into work procedures, and to periodically inspect work performance to assure that procedures containing QC inspections are being followed. It is not clear that the revised paragraph would require the QA Operations Manager to be responsible to ensure performance of the deleted responsibilities.

9-5 Table 2, Part b) Second Level QA Responsibilities: Deleted QA management in-line responsibility for assuring that controlling documents for safety-related activities include appropriate quality requirements. This responsibility was reassigned to line managers and supervisors. This represents a reduction in commitments which requires additional justification for our review. Refer to our comments for page 2-6.