#### APPENDIX B

#### U. S. NUCLEAR REGULATORY COMMISSION

#### REGION IV

NRC Inspection Report: 50-298/84-22 Construction Permit: CPR-46

Docket: 50-298

Licensee: Nebraska Public Power District (NPPD)

P. O. Box 499

Columbus, Nebraska 68601

Facility Name: Cooper Nuclear Station (CNS)

Inspection At: Cooper Nuclear Station Site, Nemeha County, Nebraska

Inspection Conducted: November 13-16, 1984

Inspector:

D. L. Garrison, Reactor Inspector

Project Section A

Approved:

P. Jaudon, Chief, Project Section A

Reactor Project Branch 1

12/14/84

Date

## Inspection Summary

Inspection Conducted November 13-16, 1984 (Report 50-298/84-22)

Areas Inspected: Routine, unannounced inspection of procurement, receipt and storage, and licensee action on a previous violation. The inspection involved 22 inspector-hours onsite by one NRC inspector.

Results: Within the three areas inspected, one violation was identified (failure to use flame resistant covering materials, paragraph 4).

#### DETAILS

## 1. Persons Contacted

#### NPPD

\*P. V. Thomason - Division Manager, Nuclear Operations

\*G. Horn - Construction Project Manager

\*V. L. Wolstenholm - Quality Assurance Manager

\*D. A. Whiteman - Technical Staff Manager

\*J. Meacham - Technical Manager

\*L. L. Roder - Administrative Service Manager

D. Overbeck - Procurement Supervisor

\*C. R. Goings - Regulatory Compliance Specialist

N. Pendleton - Quality Assurance Engineer

### NRC

\*D. Dubois - Senior Resident Inspector, Region IV, CNS

\*J. Jaudon - Section Chief RPSA/1, Region IV \*E. H. Johnson - Branch Chief RPB1, Region IV

In addition to those listed the NRC inspector held discussions with several other licensee employees.

\*Denotes those present at the exit interview.

# 2. Licensee Action on Previous Inspection Findings

(Closed) 8409-01 (Violation) - Items identified as being in a rejected status were not tagged as such in accordance with 10 CFR 50, Appendix B, Criterion VIII; Identification and Control of Materials, Parts, and Components; and CNS procedures.

The NRC inspector reinspected the area where the deficiency was noted during this inspection period. Eighteen items, in the reject area were checked by the NRC inspector, with each item being found to be properly tagged. Additionally, two other areas were inspected for conformance to the requirements of "hold" and "reject" tagging. Fifty-two items were verified as being tagged properly. It was further noted during a tour of the main warehouse that three items were observed as not being tagged out of the several thousand items stored; however, these items were in the process of being identified and categorized.

This item is closed.

## 3. Procurement

The purpose of this inspection was to determine whether the purchasing of materials used in safety-related applications was in conformance with 10 CFR 50, Appendix B requirements.

The first purchase order reviewed (215357) was noted to have included all the applicable requirements from the requisition. These included classification, units, certifications required, signatures, requirements of 10 CFR 50, Appendix B; ANSI; 10 CFR 21; and other appropriate requirements.

The purchase order concerned two actuators which were sent to the manufacturer for overhaul, rebuilding and testing to original specifications. The returned units were accompanied with the required statement of conformance and two pages of test data. These had been reviewed and accepted by the licensee. The NRC inspector noted that the actuators, considered to be spare parts, were crated in the main warehouse, properly identified, and tagged.

The second purchase order reviewed (231140) was for 600 pounds of 308L weld rod which was to be used on the intake structure. The received shipment had been accepted and issued to the requisitioner. No deficiencies were noted in the preparation and handling of this order; however, it was noted that the order contained the statement "CMTR required" with no further explanation as to what code, year, or other requirements were needed. 10 CFR 50, Appendix B, Criterion IV, "Procurement Document Control," requires, ". . . design basis, and other requirements which are necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, . . . " This item is considered open pending review of additional site requisitions and purchase orders (8422-02)

# Receipt and Storage

The purpose of this inspection was to determine whether the receipt and storage of parts and materials used in safety-related applications was in conformance with 10 CFR 50, Appendix B, requirements.

a. The NRC inspector reviewed Licensee Procedure 1.6, "Storage,"
Revision 0, dated September 26, 1984. This procedure appeared to
adequately address the general requirements of the approved quality
plan and supporting ANSI documents for warehouses.

Inspection of the warehouse for implementation of Licensee Procedure 1.6 revealed the following acceptable conditions:

- An absence of food and drink containers and prohibitions against tobacco usage.
- Stored material was properly stacked, cribbed, binned or palletized, as appropriate.
- Waterproof marking ink had been used on identification and other tags.
- Stainless and carbon steel piping stock were separated.

The NRC inspector noted that tarpaulins and plastic used for covering material stored out-of-doors was not marked as flame-resistant. This is a requirement of Licensee Procedure 1.4, "Requisitioning," Revision 0, dated September 26, 1984. The failure to use flame resistant material is an apparent violation (8422-01).

The shelf life of materials that deteriorate with time was examined in the main warehouse and tool room. Two items were inspected in the warehouse, a Vitron disc and an Anco Solenoid valve. Both items were identified, tagged and vendor records were retrievable from the file. Five different sizes of cans containing paints, primer, converter, zinc filler and thinner were examined in the tool room for expiration dates. All were noted to be within its required shelf life.

The NRC inspector found that Licensee Procedure 1.5, "Receiving," Revision 0, dated September 26, 1984, required that receipt inspection personnel be qualified in accordance with ANSI N45.2.6-1978. The certifications for three individuals were examined for areas qualified, basis for certification (education), training and work experience, signatures, and effective dates. The certification program which was previously under the quality assurance group had been changed to the responsibility of the procurement group.

In the recirculation pipe laydown area, the NRC inspector noted that a black colored duct tape, made by Tuck, was being used extensively on the stainless pipe to close the ends. On questioning the licensee personnel, it could not be determined if the tape was approved for project use or whether the tape was low or chloride free. This item is considered unresolved pending a review of documentation as to the tape's use and chemistry. (8422-03)

The NRC inspector, upon examining the recirculation pipe for identification, noted that low stress mushrooming steel stamps had been used to identify the material specification and heat number. The manufacturer's identification markings, however, appeared to have been made with steel stamps of a type that could induce stress. The

contract specification for the stainless steel pipe required that all stamping be performed using low stress stamps. This item is considered unresolved pending review of certified reports from the licensee attesting to the stamps actually used and pending examination of masks to be made of the stamped areas. These masks will permit verification that low stamps were used. (8422-04)

It was noted that some of the recirculation spool pieces had a golden tint and one large cross piece appeared either to have been heated excessively during grinding or to have been etched by chemicals. This item is considered open pending further inspection to determine the cause of the discolorations. (8422-05)

The NRC inspector noted that the materials used for covering the stainless steel recirculation pipe had words indicating flame retardant properties printed on the edges. It could not be determined at the time of the inspection either if the covering was approved for project use or whether it was of low chloride composition. This item will remain open pending review of purchase orders and material certifications. (8422-06)

The replacement stainless steel piping is required to be type 316L or "Nuclear Grade." It was noted that the material test reports state 316 and in many cases .o not indicate flattening, bend or hydrostatic data required by ASTM. This item is considered open pending further review of the contract specification requirements. (8422-07)

## 6. Exit Interview

An exit interview was conducted on November 16, 1984. At this meeting the scope of the inspection and the findings were summarized.