

DMB

OCT 19 1984

In Reply Refer To:
Docket: 50-298

Nebraska Public Power District
ATTN: J. M. Pilant, Manager, Technical
Staff-Nuclear Power Group P.O. Box 499
Columbus, Nebraska 68601

Gentlemen:

We have completed our review of Revision 1 to Appendix D of the Cooper Nuclear Station (CNS) Updated Safety Analysis Report (USAR), "Cooper Nuclear Station Quality Assurance Program for Operation," as submitted by your letter dated March 5, 1984, and modified by your letter dated August 13, 1984.

We find two areas of concern in the subject revision, design control, and quality assurance records. These concerns are discussed below:

1. Design Control of "Commercial Grade" Spare Parts

Section 2.3, "Design Control," was changed by Revision 1. A review of that section shows that it does not clearly define design control required for "commercial grade" spare and replacement parts used in safety-related (essential grade) applications.

In some cases, an original "commercial grade" part may have been purchased from a manufacturer who did not have a quality assurance program meeting 10 CFR 50, Appendix B; and design control, including qualification of material substitutions, was not invoked. Apparently, these commercial parts were qualified, either by testing or analysis, by the architect engineer (AE) or the Nuclear Steam System Supplier (NSSS).

In these cases, replacement parts purchased by you may be the same in form, fit, and commercial function; however, they are not considered qualified for a safety-related function, per se, based on a model number or some other commercial designation.

Verification must be performed to insure that the part utilized for safety-related applications are functionally the same as the part originally qualified. This verification may consist of qualification by testing and analysis, such as by lot qualification test, or other definitive, auditable, documented, qualification. This qualification must be performed at the time the "commercial grade" part is "dedicated" for safety-related use (basic component), and before return to service (operability).

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2. Quality Assurance Records

Revision 1 changed Section 2.17, "Quality Assurance Records." The section marked as being revised indicates that the CNS records management system is based on duplicate records. Certain required records, such as radiographic film, are not duplicated. Your quality assurance program must address these records also.

Section 8.9(b), which discussed ANSI N45.2.9 and Regulatory Guide 1.88, and CNS implementation has been changed. Revision 1 takes exception to ANSI N45.2.9 for storage of temporary records, and proposes such storage in one (1) hour Class 350 UL fire rated file cabinets.

This change has been discussed with the NRC Quality Assurance Branch. To be acceptable to NRC, this section must limit the use of the subject file cabinets to fire resistive buildings which have a fire loading that is within the limits of Table 5533 of the National Fire Code.

Original Signed By

E. H. Johnson

E. H. Johnson, Chief
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bcc to DMB (IE01)

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