



Nebraska Public Power District

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November 9, 1978

Director, Nuclear Reactor Regulation
Attention: Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch No. 3
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Additional Information
Quality Assurance Program
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

Dear Mr. Ippolito:

This letter is in response to your letter to the District dated September 18, 1978 which requested additional information concerning the Quality Assurance Program for Cooper Nuclear Station. Our response to this request is contained in Enclosure 1.

You will note that our response to Item 5 indicates that we will submit additional information (as Appendix A to Amendment 39) by January 15, 1979. Specifically, this appendix will contain the exceptions which the District is proposing to take relative to the requirements contained in the "Orange Book". Since Commission approval of the proposed exceptions will not be realized for several months, we would like to request approval of the Quality Assurance Program providing the remaining responses contained in Enclosure 1 are satisfactory. We would anticipate that such approval would specifically indicate that the District will comply with the requirements of the "Orange Book" until such time as any exceptions are approved by the Commission.

Should you have any comments, or require additional information, regarding the Quality Assurance Program, please do not hesitate to contact me.

In addition to one signed original, 39 copies of this information are also submitted.

Sincerely,

Jay M. Pilant
Director of Licensing and
Quality Assurance

/cmk
Enclosure

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RESPONSE TO "REQUEST FOR ADDITIONAL INFORMATION
COOPER NUCLEAR STATION (FSAR AMENDMENT 39)"

1. Throughout Amendment 39, reference to "structures, components, and systems" has been changed to "structures and systems," eliminating "components." Thus, there appears to be no commitment that Quality Assurance documents will identify components to be covered by the Quality Assurance Program. Please commit to establish a list of components to which the Quality Assurance Program applies or provide an alternative for the staff's evaluation. Also, the first paragraph under 1.4 on Page D-9-6 must include "components" to be compatible with Appendix B to 10 CFR Part 50. Similarly, the last paragraph on Page D-9-14 should include the identification of "safety-related structures, systems, and components."

Response

Reinstated the word "component" throughout the amendment. Presently, CNS operations with the assistance of the CNS QA staff is developing a comprehensive list of essential components for Cooper Nuclear Station.

2. The change at the middle of Page D-9-3 appears to eliminate the involvement of the QA Department in personnel assignments to surveillance and audit tasks. The first change on Page D-9-56 is similar. Please explain the responsibility of the QA Department in these areas.

Response

The words "and will be verified by the QA Department" (D-9-3) have been added.

The reason for this addition is that the QA Department does not have the organizational authority of itself to assign personnel from other departments to surveillance and audit activities.

For the same reason a similar statement is added on Page D-9-56.

3. Item "F" on Page D-9-5 no longer provides a commitment for "ready retrieval" of documents. Please reinstate this commitment or provide a commitment to comply with the regulatory position of Regulatory Guide 1.88.

Response

The commitment for "ready retrieval" has been specifically reinstated.

4. The second (last) change on Page D-9-12 eliminates the commitment for personnel assigned to the QA Department to be independent of those performing refueling and in-service inspections. Please justify this change or replace the commitment.

Response

The language and commitments stated in approved Amendment 37 have been reinstated.

5. The revised words at the top of the Page D-9-14 now state: "The District's QA Program will be consistent with the Quality Assurance guidelines contained in the Orange Book 10-23-73." Please revise these words to provide a clear commitment to "comply with the regulatory guidance provided in the Orange Book and to meet the requirements and guidelines of the included ANSI standards" or provide an alternative for the staff's evaluation.

Response

The revision of the subject words reflects the District's concurrence with this request for commitment, "the District's QA Program will comply with the Quality Assurance guidelines contained in the Orange Book 10-23-73 with exceptions as described in Appendix A" (to be submitted by January 15, 1979 for your review and approval).

6. Please explain the significance of changing the short paragraph on the middle of Page D-9-15 from: "Power Group Departments will be required to perform audits and inspections of the nuclear station under the direction of the Director of Licensing and Quality Assurance" to: "Designated individuals will be required to perform management overviews of certain CNS quality-related activities at the direction of the Director of Licensing and Quality Assurance."

Response

A statement has been made, in parenthesis, to reinstate the Power Operations Group, Power Projects Group, and outside qualified individuals, participation to this paragraph.

7. The changed last paragraph at the bottom of Page D-9-17 no longer makes it clear that the QA organization is responsible for all the activities listed. Please clarify.

Response

The language and commitments stated in approved Amendment 37 have been reinstated.

8. The revised wording in the last paragraph under "Document Control" on Page D-9-20 of Revision 6 no longer provides a clear commitment to ANSI N45.2.9. Please clarify your intent to meet the provisions of ANSI N45.2.9.

Response

The language and commitments stated in approved Amendment 37 have been reinstated.

9. Please replace the commitment that "Procurement documents shall be available at the receiving plant to qualify the receiving inspection," in the first paragraph under "Control of Purchased Material, Equipment, and Services" on Page D-9-21 of Revision 7 or provide an alternative for the staff's evaluation.

Response

The language and commitments stated in approved Amendment 37 have been reinstated.

10. Please identify who is responsible for issuing (releasing) items which have been placed in a "segregated storage area" (Page D-9-21, last revision).

Response

Station storekeeper has been added.

11. The last paragraph of "Quality Assurance Records" has been changed, even though there is no indication in the margin. The addition of the words "as a guideline" appears to weaken the commitment made in Revision 6. Please reinstate the wording in Revision 6 or provide an acceptable alternative.

Response

The language and commitments stated in approved Amendment 37 have been reinstated.

12. Please explain the significance of the parenthetical expression added at the bottom of Page D-9-32.

Response

SRAB Audits are not conducted within the constrictions of the CNS QA Program. Therefore, there is no specific requirement for the organizational independence of the SRAB Auditor.

These management-level audits are intended to verify that operation of the plant is consistent with company policy and rules, approved operating procedures and operating license provisions; review important proposed plant changes, tests, and procedures; verify that unusual events are promptly investigated and corrected in a manner which reduces the probability of recurrence of such events; and detect trends which may not be apparent to a day-to-day observer, all in accordance with the CNS Tech Specs.

Thus, this paranthetical expression was added in an attempt to clarify this question of independence.

It has been deleted.

13. The fire protection system has been eliminated from Table 1. Please provide a description of the QA Program for fire protection in accordance with BTP ASB 9.5-1 or replace the fire protection system in Table 1.

Response

The QA Program for the fire protection system is described in Section C of NPPD's "Fire Protection Review to Appendix A to BTP APCS 9.5-1" submitted to the NRC on December 17, 1976.

In addition, planned and periodic audits of all activities associated with the CNS fire protection system are performed by the QA staff in accordance with the requirements established by the NFPA.

All fire protection activities, as defined in QAP-800, are subjected to QA coverage similar to other safety-related systems with the exception of imposing a 10CFR50, Appendix B, QA Program requirement upon vendors. These vendors must meet the requirements of the applicable NFPA codes.

14. Please justify the deletion of the following items from Table 1, particularly when there appears to be little question that Items a, b, and f perform a safety-related function:

- a. Neutron Source
- b. TIP
- c. Fuel Pool Cleanup
- d. Instrument Air
- e. Reactor Feed Pumps
- f. Reactor Recirculating Pumps
- g. Reactor Building H&V

Response

- a. The Neutron Source was removed from the reactor vessel and is no longer considered essential.
- b. Traveling Incore Probe (TIP) is a calibration device used for adjusting power range monitors during power operation. The loss of this device would have no adverse affect on the station's ability shutdown safely and remain in a safe shutdown condition.
- c. Fuel Pool Cleanup is part of the fuel pool cooling system which can be isolated from the fuel pool cooling without adversely affecting the safety-related function of the fuel pool cooling system and is considered non-essential.
- d. Instrument Air - The safety-related equipment serviced by this system are designed to fail in the safe condition. The loss of this system would have no adverse affect on the station's ability to shutdown safely and remain in a safe condition. The instrument air system is considered non-essential.
- e. Reactor Feed Pumps are not considered part of the emergency core cooling system and the loss of these pumps would have no adverse affect on the station's ability to shutdown safely and maintain coolant to the reactor core. However, these pumps do serve as pressure boundaries and in this context, these pumps (pressure retaining parts) are considered safety-related. Reinstated.

- f. Reactor Recirculation Pumps are not considered part of the emergency core cooling system and the loss of these pumps would have no adverse affect on the station's ability to shutdown safely and maintain the coolant to the core. However, these pumps do serve as pressure boundaries and in this context, the pumps (pressure retaining parts) are considered safety-related. Reinstated.
 - g. Reactor Building H&V only operates during normal plant conditions. When an adverse operating condition exist, the system is automatically isolated and the Reactor Building is processed through the standby gas treatment system. The automatic isolation portion of the Reactor Building H&V system is considered safety-related. Reinstated.
15. The top of Page D-9-52 refers to "audits or work associated with those activities listed in Table 1..." Table 1 does not list activities. Similarly, the bottom of Page D-9-75 speaks of "Records contained in these files," although the change eliminated the files. Please clarify.

Response

Typographical error, should be Section 4.1.3., records files.

16. The deletion at the top of Page D-9-59 implies that outside contractor personnel who augment the normal station staff for particular activities need not be qualified to perform their work. Please justify or eliminate the deletion.

Response

The language and commitments stated in approved Amendment 37 have been reinstated.

17. The first change on Page D-9-60 adds "when required" and deletes "and enforce." Please provide examples of when such agreements and procedures would not be required and clarify what organization is responsible to verify conformance to such agreements and procedures.

Response

The language and commitments stated in approved Amendment 37 have been reinstated.

18. Please clarify what is meant by the "When required" added to the first full paragraph on Page D-9-65 and the "when required" added to the last paragraph on Page D-9-72.

Response

It is not within the scope of the CNS QA Program to determine the extent or nature of the QC activities at CNS. The purpose of the QA Program is to verify the quantitative and qualitative results of such activities. In addition, the QA supervisor provides assistance, when requested, by station management.

The language and commitments stated in approved Amendment 37 have been reinstated.

19. In-Service Inspection has been eliminated from Page D-9-68 as a functional area which requires a QA plan. Please justify or eliminate this deletion.

Response

The language and commitments stated in approved Amendment 37 have been reinstated.