

# Nebraska Public Power District

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CNSS887228

May 9, 1988

Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Subject: NPPD Response to Inspection Report 50-298/88-04

Gentlemen:

This letter is written in response to your letter dated April 7, 1988, transmitting Inspection Report 50-298/88-04. Therein you indicated that certain of our activities were in violation of NRC requirements.

Following are statements of the violations and our responses in accordance with 10CFR2.201.

## A. STATEMENT OF VIOLATION

Criterion VII of Appendix B to 10 CFR Part 50 and the licensee's approved "Quality Assurance Program for Operation" require that measures be established to assure that purchased material, equipment, and services conform to the procurement documents.

Section V.B.2 in Plant Services Procedure 1.5 states, in part, "The Receipt Inspector shall perform receipt inspection of all ... Essential Commercial Grade ... parts or components with technical data requirements in accordance with and documented on the Receipt Inspection Report."

Contrary to the above, with respect to replacement diesel generator cooling fan blades which were designated essential commercial grade:

1. It could not be established from examination of identification on blades that all of the blades were manufactured from the material specified on the procurement documents.
2. The blades were not receipt inspected by the Receipt Inspector prior to installation.

This is a Severity Level IV violation. (Supplement 1)(298/8804-01)

## REASON FOR VIOLATION

An investigation was conducted as to why the material identification stenciling could not be appropriately verified by the NRC Inspector. The

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following documents were reviewed: ASTM Standard B209, Aluminum and Aluminum-Alloy Sheet and Plate, which is the governing standard for 6061 T6 material, Federal Standard Number 184, Identification Marking of Aluminum . . . ., referenced by B209, and ASTM Standard B666, Identification Marking of Aluminum Products. The latter two documents state, "Product marking shall be such that it shall not rub off or be otherwise obliterated by contact arising from normal handling, exposure to the elements, shipment, and storage. Marking on the product shall be with marking fluid applied by printing, stamping, or stenciling. Ghost images of the characters may remain upon the removal of marking applied."

The supplier of the aluminum sheet, Vincent Metals, and an independent supplier were contacted about the apparent fading of the ink. They indicated that the metal will absorb the ink over a period of time. In addition, the four spare blades stored in the warehouse were re-inspected in natural lighting and ghost images of the material marking were considerably more apparent.

Based on this information, it is believed that the original verification of the material identification was satisfactory and we request your reconsideration of Item 1 in the statement of violation.

Regarding Item 2, it is acknowledged that, contrary to the requirements of Section V.B.2 in Plant Services Procedure 1.5, the 24 diesel generator fan blades installed on the generators were not receipt inspected by the Receipt Inspector prior to installation, rather the inspection was performed by a CNS Engineer. The reason is attributed to personnel error in not properly following procedure guidelines.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A letter has been issued to all station personnel describing the receipt inspection requirements contained in Plant Services Procedure 1.5. The letter also advises personnel of their responsibility for ensuring Security or warehouse personnel are made aware of material being brought on site which may require receipt inspection.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The blades are considered fully qualified for continued use on the diesel generators. However, Cooper Nuclear Station has purchased new aluminum blades from the generator manufacturer which will be used to replace all blades now installed. This activity is being performed during the current refueling outage.

In addition, Plant Services Procedure 1.5 will be reviewed and appropriate precautions and additional steps incorporated, where necessary, to more clearly define receipt inspection requirements for expedited materials.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

July 29, 1988.

B. STATEMENT OF VIOLATION

Failure to have Approved 10CFR21 Procedure

Paragraph 21.21 in 10 CFR Part 21 requires each entity subject to the regulations in 10 CFR Part 21, to adopt procedures which provide for evaluating deviations and for notification when a failure to comply or the existence of a defect is identified.

Contrary to the above, procedures have not been adopted for implementing the above provisions of 10 CFR Part 21.

This is a Severity Level IV violation. (Supplement I) (298/8804-02)

REASON FOR VIOLATION

The District admits that a formal procedure adequately detailing the process for evaluation and notification in accordance with 10CFR21 was not in place at the time of this inspection. However, the need for the development of a procedure formally detailing this process was previously recognized, and at the time of the subject NRC Inspection, a Nuclear Power Group (NPG) Directive had been drafted and was in the review stage.

Cooper Nuclear Station (CNS) has consistently notified the supplier and the Nuclear Regulatory Commission of deficiencies which were identified as potentially reportable under 10CFR21. The requirements of 10CFR21 have previously been addressed in other station procedures as follows:

- o Cooper Nuclear Station (CNS) Procedure 0.5.1, "Nonconformance and Corrective Actions," specifically addresses the review of nonconformance reports (NCR) for 10CFR21 reportability.
- o CNS Procedure 0.10.1, "Operating Experience," identifies 10CFR21 reports received from vendors/NRC as document to be reviewed for applicability to CNS.

This violation is the result of failing to expedite development of a complete and thorough, formal procedure to implement the requirements of 10CFR21.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Development of a Nuclear Power Group (NPG) Directive which defines the organizational responsibilities and requirements of the NPG to assure the District's compliance with 10CFR21, Reporting Defects and Noncompliance, is in progress and is being expedited through the final review and approval stages.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO PREVENT FURTHER VIOLATIONS

The completion and approval of the aforementioned NPG Directive will provide assurance for avoidance of further violations.

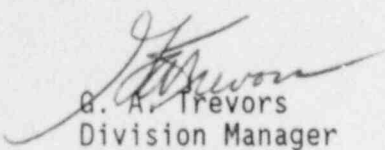
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DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

July 1, 1988

Should you have any questions concerning this matter, please contact my office.

Sincerely,

  
G. A. Trevors  
Division Manager  
Nuclear Support

GAT:cb16/3(2E)

cc: U. S. Nuclear Regulatory Commission  
Regional Office - Region IV

NRC Resident Inspector  
Cooper Nuclear Station