



Nebraska Public Power District

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NLS8800280

May 27, 1988

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

Subject: NPPD Response to IE Inspection Report No. 50-298/88-10

Gentlemen:

This letter is written in response to your letter dated April 27, 1988, which transmitted IE Inspection Report No. 50-298/88-10. Therein you indicated that certain of our activities were in violation of NRC requirements.

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

A. STATEMENT OF VIOLATION

FAILURE TO ENSURE THAT WELDING IS CONDUCTED USING QUALIFIED WELDING PROCEDURES

Criterion X of Appendix B to 10 CFR Part 50 states, in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity ..." Paragraph 2.10 of the Nebraska Public Power District Quality Assurance Program for Operations - Policy Document, Revision 3, states, in part, "Quality Assurance audits and surveillance of activities such as maintenance, repair, and modifications will include direct observation; ..." Welding is a special process required to be conducted by qualified personnel using qualified procedures. This is required by Criterion IX of Appendix B to 10 CFR Part 50.

Contrary to the above, Quality Assurance surveillances of safety-related welding activities were not performed to verify by direct observation that significant modifications such as Design Changes 87-113 and 87-063 were accomplished by qualified personnel using qualified welding procedures.

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This is a Security Level IV Violation (Supplement 1)
(298/8810-02)

REASON FOR THE VIOLATION

Quality Assurance surveillances had not been performed to verify the availability of weld procedures to welders. Additionally, conformance to Welding Procedure Specifications (WPS's) had been limited to verification of parameters identified on corresponding weld checklists (WCL's). As pointed out by the NRC Inspector, not all limiting welding parameters imposed by the governing WPS's are identified on WCL's.

CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

Prior to the exit proceedings associated with the NRC Inspection, Quality Assurance Surveillance Checklist SC-700-06 was formally revised to provide verification of the availability of weld procedures to welders.

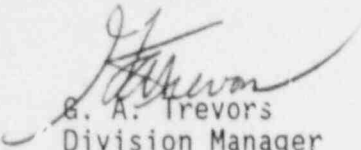
Subsequent to the inspection, a dedicated Surveillance Checklist was generated and approved to provide Quality Assurance verification of the application of critical parameters associated with governing Weld Procedure Specifications. This checklist has been added to the annual scheduled surveillances and is being used during Quality Assurance outage monitoring.

DATE OF FULL COMPLIANCE

The District is currently in full compliance with this requirement.

If you have any questions regarding this response, please contact me or G. R. Horn at the site.

Sincerely,


G. A. Trevors
Division Manager
Nuclear Support

GAT:gmc/n124/4(NLSC1)

cc: U.S. Nuclear Regulatory Commission
Region Office, Region IV

NRC Resident Inspector
Cooper Nuclear Station