

# Nebraska Public Power District

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CNSS897279  
June 15, 1989

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: NPPD Response to Notice of Violation - NRC Inspection Report 89-17

Gentlemen:

This letter is written in response to your letter dated May 17, 1989, transmitting Inspection Report 50-298/89-17. Therein you indicated that certain of our activities were in violation of NRC requirements.

Following is a statement of the violations and our response in accordance with 10CFR2.201.

## STATEMENT OF VIOLATION

### A. Failure of the ISI Program to Identify All Applicable Supports and Welds

Criterion V of Appendix B to 10CFR Part 50 and the licensee's approved quality assurance program description, require that activities affecting quality shall be accomplished in accordance with documented instructions.

Paragraph 4.2.1 of the ISI program for ASME classes 1, 2, and 3 components, Revision 3, dated March 3, 1985, for the Cooper Nuclear Station requires that the ISI program provide an item listing.

Contrary to the above, the NRC inspector found that the ISI program failed to identify, in its listing, nine supports (RFH-FC-112, 59A, 58, 56, 54, 54A, 53; and RHF-FB-59 and 55) and 15 welds (numbers HPID-52 through 66) that should be listed in the ISI Program.

### Reason for the Violation

The reason for the violation was 1) lack of attention to detail by the contractor who prepared Revision 3 of the ISI program and 2) subsequent inadequate review of the ISI program by the District prior to its acceptance.

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A review of the project files for Revision 3 to the ISI program revealed that isometric drawing 2623-3 was indeed contained on the original list of isometric drawings bounded by ASME Section XI. Furthermore, it was observed that this isometric drawing was flagged as "not presently available" (for review). As such, it appears that the necessary follow-up actions to enable review of isometric drawing 2623-3 were not completed due to the reasons stated above, resulting in the omissions cited in the Notice of Violation.

One other omission (RFH-FC-112) not contained on isometric drawing 2623-3 is considered a random omission which is also attributable to lack of attention to detail and inadequate program review.

Nebraska Public Power District admits to the violation as stated.

#### Corrective Steps Which Have Been Taken and the Results Achieved

A detailed review of approximately 80 isometric drawings was performed to determine the extent of welds missing from the ISI program. The results of this review identified 18 code class one and 30 code class two welds which were shown on the applicable isometric drawings, but were not listed in the ISI program as required. However, despite these omissions, the minimum percentage of completed exams required by ASME Section XI had been fulfilled. Therefore, an operability concern did not exist.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations

All omitted welds and currently identified components will be added to the ISI program through the issuance of an addendum by August, 1989. A detailed review will be completed by September, 1989, to determine the extent of additional component supports missing from the ISI program. Any omissions identified by this review will be added to the ISI program through the issuance of an addendum by October, 1989.

Additional staff has been added to the CNS Engineering Department to provide increased overview of ongoing programs. The District feels that the additional staffing is sufficient to prevent recurrence.

#### Date When Full Compliance Will Be Achieved

All necessary ISI program changes will be completed by October 1989.

#### B. Welding Controls

Criterion IX of Appendix B to 10CFR Part 50 states, in part, "Measures shall be established to assure that special processes, including welding, ....are controlled and accomplished by qualified personnel using qualified procedures ...." This is implemented by the licensee's approved Quality Assurance plan.

Paragraph QW-200 in Article II of Section IX to the ASME Code states that changes may be made in the nonessential variables to suit production requirements provided such changes are documented either in an amendment to the original welding procedure specification (WPS) or a new WPS.

Contrary to the above, changes in non-essential variables specified in a WPS (amperage and voltage) had been made during production welding without documenting such changes.

#### Reason for the Violation

The reason for the violation is less than adequate procedures and failure of personnel to follow procedures. This is evident considering the corrective actions that have been implemented to date. As such, corrective action emphasis to prevent recurrence is being placed primarily on procedure and training enhancements. Nebraska Public Power District admits to the violation as stated.

#### Corrective Steps Which Have Been Taken and the Results Achieved

Statements of corrective actions were previously transmitted to the Nuclear Regulatory Commission in NPPD's letter (CNSS895719) dated May 8, 1989, G. R. Horn (Division Manager of Nuclear Operations) to L. J. Callan (Director, Division of Reactor Projects). These corrective actions are reiterated as follows:

1. A programmatic change has been implemented to ensure that each welder is cognizant of pertinent welding procedure requirements. Prior to performing a given welding procedure, and each day thereafter when welding activities are in progress, the welder must read the welding procedure and acknowledge (by signature) his understanding of its requirements. This methodology will be followed until the Weld Checklist changes described in Item 2, below, can be implemented. In addition, each welder has received counseling regarding the necessity of adhering to all welding procedure requirements, especially in the need to either meet the non-essential variables specified, or obtain approval for and document any deviations.
2.
  - a. A very experienced and knowledgeable Welding Engineer (consultant) has been retained to provide a third party review of the existing welding procedures to ensure their adequacy and make the procedures more user friendly.
  - b. In addition, more detail is being added to the welding process control document, the Weld Checklist, regarding the parameters which are under the welder's control. The Weld Checklist is also being made more user friendly to facilitate welder adherence to the specified requirements.

3. To further ensure welder adherence to welding procedure requirements, the depth and frequency of the independent review achieved by our Quality Assurance and Quality Control personnel has been increased. The pertinent Q.A. surveillance checklist is being used to document verification of both essential and non-essential variables with special attention to the electrode amperage being used. Several of these surveillances are to be performed each week to observe both station welders and contractor welders. The described level of independent review will be continued for the duration of the outage.

Supplements to these corrective actions were subsequently transmitted to the Nuclear Regulatory Commission in NPPD's letter (CNSS890248) dated May 25, 1989, G. R. Horn (Division Manager of Nuclear Operations) to J. L. Milhoan (Director, Division of Reactor Projects). These supplementary corrective actions are reiterated, in part, as follows:

- a. Selecting frequently used Welding Procedure Specifications (WPSs) that required revision to clarify the requisite variables. Using the CNS temporary procedure change mechanism, any required changes were made prior to further use of the procedure. Certain procedures, which are not frequently used, have not yet been revised, but they will be changed prior to use. In the longer term, the temporary procedure changes will be made permanent.
- b. Prior to performing welding activities, each welder will be issued a controlled manual which contains up-to-date copies of the welding procedures which he is qualified for and expected to use. The welders will continue to review the appropriate WPS prior to use, and daily thereafter, when welding. These measures will continue until they can be superseded by permanent, equivalent programmatic changes.
- c. A correlation has been made regarding welding machine amperage and the welding machine dial settings. Charts are posted on each welding machine. These charts will be signed and dated to verify their authenticity. The welders have been instructed to refer to these charts when setting up the machine to ensure that the amperage is within the limitations of the Welding Procedure Specification. For WPSs which require voltage to be monitored, the capability to monitor this parameter will be provided.

An evaluation will be performed to determine the most viable option for monitoring these parameters in the future. In the interim, a monthly PM will be implemented to perform the aforementioned correlation on active welding machines. The results will then be trended to determine the optimum PM frequency.

- d. For the remainder of the Spring 1989 Outage, a dedicated roving Welding Supervisor was added to each shift, in addition to the supervisory overview presently in place. This supervisor overruled all welding activities occurring on his shift.
- e. Regarding the depth of the independent Quality Assurance review of welding activities, two surveillance checklists have been developed. One checklist is designed to physically observe welding in progress and verify compliance with essential and non-essential variables. The other checklist is designed to assess welder's knowledge of controllable welding parameters by direct interview of the welder.

The surveillances will be coordinated to be conducted on each newly qualified welder within the subsequent week's schedule following his/her qualification. Following completion of the initial surveillances as described above, surveillances will be scheduled and conducted such that at least 20% of currently qualified welders will be evaluated each week. Such surveillances will emphasize in progress safety-related welding to the greatest extent practicable.

Selection of welders to be evaluated shall be such that different welders will be chosen each week, to the greatest extent practicable. It is intended that the weekly surveillance process will continue until such time as the level of welding activity is significantly reduced (outage completion), or procedural provisions are approved for use which will necessitate re-evaluation of the surveillance function.

The District believes that these corrective actions adequately address the concerns identified herein.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations

In addition to the corrective steps identified above, the District will retain the aforementioned Welding Engineer (consultant) to perform a comprehensive, independent review of the CNS Welding Program, including all procedures and field implementation practices. It is expected that further enhancements to the CNS Welding Program will be implemented as a result of the contractor's recommendations. Furthermore, adequacy of personnel training in the areas of ASME Section IX methodology and procedure compliance will be reviewed to identify any weaknesses that may exist.

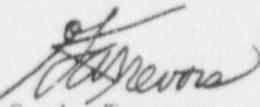
#### Date When Full Compliance Will Be Achieved

All corrective actions will be completed by October, 1989.

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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:sa

cc: U.S. Nuclear Regulatory Commission  
Region IV  
Arlington, Texas

NRC Resident Inspector  
Cooper Nuclear Station