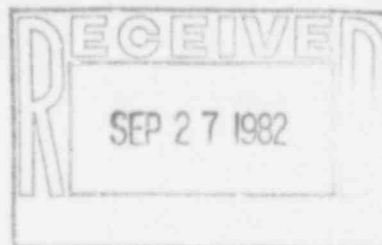


Nebraska Public Power District

COOPER NUCLEAR STATION
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402) 825-3811

LQA8200019

September 24, 1982



Mr. G. L. Madsen
Reactor Projects Branch I
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/82-20

Dear Mr. Madsen:

This letter is written in response to your letter dated August 26, 1982, transmitting Inspection Report No. 50-298/82-20. You indicated that certain of our activities were in violation of NRC requirements.

Following are statements of each violation and our response in accordance with 10CFR2.201.

Statement of Violation

10CFR20.203(e), "Caution signs, labels, signals, and controls", requires that areas in which specified amounts of licensed material are used or stored be conspicuously posted, "CAUTION RADIOACTIVE MATERIAL".

Contrary to this requirement, on July 1, 1982, you failed to post the radioactive storage areas outside the reactor rail track airlock and near the southwest corner of the licensee's protected area.

Corrective Steps Which Have Been Taken and the Results Achieved

Immediate action included the labeling of all drums and boxes containing radioactive materials with the posting "CAUTION RADIOACTIVE MATERIAL". All drum and boxes outside the plant have been roped and conspicuously posted.

Corrective Steps Which Will Be Taken to Avoid Further Violations

This violation and its associated regulation will be discussed with Chemistry and Health Physics personnel. In addition, a concentrated effort is being made by CNS to decon or dispose of wastes and tools stored in drums and boxes that were used in the drywell and torus modification work.

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The Date When Full Compliance Will Be Achieved

Cooper Nuclear Station is presently in full compliance. Discussions with Chemistry and Health Physics personnel concerning this violation will be completed by October 1, 1982.

Statement of Violation

10CFR20.203(b), "Caution signs, labels, signals, and controls", requires that each radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words, "CAUTION RADIATION AREA".

Contrary to this requirement, you failed to post the radiation area created by a box of radioactive material stored outside the reactor rail track air-lock.

Discussion

Procedure 9.1.2.2, "Area Posting and Access Control", which was reviewed by the NRC inspector (with no violations or deviations noted), states that "an 18 inch criteria shall be used to determine the posting requirement for Radiation and High Radiation Areas". This 18 inch distance from the surface was agreed upon with Region IV inspector during the course and followup of an inspection conducted in June of 1978.

Corrective Steps Which Have Been Taken and Results Achieved

As was stated in the inspection report, the box was moved to a posted radiation area.

Corrective Steps Which Have Been Taken to Avoid Further Violations

We disagree that this was a violation. The inspector measured 5 mRem/hr at 12 inches. Using the 18 inch criteria discussed above, the reading would not be greater than 5 mRem/hr and therefore did not constitute a radiation area.

Date When Full Compliance Will Be Achieved

We are presently in full compliance.

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Statement of Violation

10CFR20.201(b), "Surveys", requires that you make such surveys as may be necessary for you to comply with all sections of Part 20. As defined in 10CFR20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a special set of conditions.

Contrary to this requirement, you failed to make such surveys as were necessary to assure compliance with 10CFR20.101(a), "Radiation Dose Standards for Individuals in Restricted Areas". Specifically, as of June 30, 1982, you failed to make such beta radiation surveys as were necessary to evaluate personnel exposure to individuals working in the torus and near the fuel transfer chute.

Corrective Steps Which Have Been Taken and the Results Achieved

Beta radiation surveys of the torus and fuel transfer chute area were made and the results were included in the inspection report.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Procedure 9.1.1.4, "Special Work Permit", is being revised to require a beta survey whenever an SWP is written due to smearable contamination levels in excess of 2200 dpm/100 cm². Other pertinent procedures will also be revised to reflect this change during their normal review schedule.

The Date When Full Compliance Will Be Achieved

We are presently in full compliance. The revised procedure is in routing and will be approved prior to October 15, 1982.

Statement of Violation

10CFR20.401(b), "Records", requires that you maintain records showing the results of surveys required by 10CFR20.201(b), "Surveys".

Contrary to this requirement, as of June 30, 1982, you failed to maintain records for nonroutine surveys.

Corrective Steps Which Have Been Taken and the Results Achieved

We have reviewed this reported violation and determined the following:

In addition to the Health Physics Daily Log entries described in the inspection report, the following entries concerning the repair of reactor water cleanup valve, MO-15, were noted.

- 6-2-82 (1645) "Covered removal of MO-15 in drywell - gate and stem still in valve. No β noted using PIC-6A. Since gate is still seated there may still be water in leg above valve."
- 6-2-82 (1855) "MO-15 valve replacement 800 γ , 1800 - $\beta+\gamma$; 4000 - β
- 6-2-82 (2340) "Smears from gate & seal of MO-15 together read 22 mr/hr or ~ 4.5 million dpm. Gate reading w/RO-2 ~ 3.5 R/hr."
- 6-3-82 (0210) "Toured drywell, all monitors in service, gate from MO-15 under 2 lead blankets near MO-15 (reading ~ 500 mr/hr contact). Workers are using eye protection for β ."
- 6-3-82 (0925) "Toured drywell, area at MO-15 reading ~ 500 mR/hr by pipe being worked on, 2.5 R/hr $\beta\gamma$ contact on pipe opening, 1 R/hr γ contact. PCI workers "preping" pipe are using β protection."

Corrective Steps Which Will Be Taken to Avoid Further Violations

Based on the above noted log entries, we feel the surveys were adequately documented. However, we agree they could have been more descriptive with the use of the HP-100 data form as described in the inspection report. The use of CNS HP-100 data form to document nonroutine surveys will be stressed with the Chemistry and Health Physics Technicians.

The Date When Full Compliance Will Be Achieved

Cooper Nuclear Station is presently in full compliance. Discussions with Chemistry and Health Physics personnel concerning this violation and the use of HP-100 to document nonroutine surveys will be completed by October 1, 1982.

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Statement of Violation

10CFR50, Appendix B, Criterion V, requires that activities affecting quality shall be by written procedures and accomplished in accordance with these procedures. Technical Specification 6.3.4 requires that radiation control procedures shall be maintained. Procedure 9.3.6.1, "Low Volume and High Volume Air Sampler Operation and Calibration", Section C requires that air sample filters be counted on a beta counter.

Contrary to this requirement, on June 11 and June 16, 1982, you failed to count on a beta counter air sample filters taken to evaluate airborne radioactivity levels as required by Procedure 9.3.6.1.

Corrective Steps Which Have Been Taken and the Results Achieved

The resultant isotopic analysis of the two samples in question were reviewed and the calculated MPC values were found to be correct.

Corrective Steps Which Have Been Taken to Avoid Further Violations

Procedure 9.3.6.1, "Low Volume and High Volume Air Sampler Operation and Calibration", has been revised. This revision includes the option to bypass the gross beta count. If a check of the filter with the use of a pancake-type detector indicates a concentration greater than 3×10^{-9} $\mu\text{Ci/cc}$ gross, the filter will be isotopically analyzed to determine its MPC ratio. This option allows the MPC value to be calculated in a more timely manner.

The Date When Full Compliance Will Be Achieved

Cooper Nuclear Station is presently in full compliance.

Statement of Violation

10CFR50, Appendix B, Criterion V, requires that activities affecting quality shall be by written procedures and accomplished in accordance with these procedures. Technical Specification 6.3.4 requires that radiation control procedures shall be maintained. Procedure 9.1.1.4, "Special Work Permit", Section VI.B.3 requires that if the Special Work Permit is required beyond the expiration date, a new Special Work Permit be written and conditions re-evaluated and updated.

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Contrary to this requirement, on June 30, 1982, you extended the expiration date of a Special Work Permit No. 82-5-32, without re-evaluating and updating the radiological conditions as required by Procedure 9.1.1.4.

Corrective Steps Which Have Been Taken and the Results Achieved

Procedure 9.1.1.4, "Special Work Permit", states the expiration date may be up to one month plus seven days after the approval date. The intent of this statement was that Special Work Permits (SWP) could be written to cover up to one calendar month and the seven days allowed SWPs to be extended so they would not expire on weekends, holidays, or high work load days. This would also allow the flexibility to extend SWP expiration dates to coincide with normal routine monthly surveys for a given area in order to keep survey exposures ALARA by allowing one survey to cover both requirements. The original intent was also to allow an SWP to be extended up to seven days to coincide with the completion of the work function it covered.

After carefully reading the above procedure statement, it was determined that the extending of SWPs was not allowed once the expiration date was written on the SWP.

Corrective Steps Which Will Be Taken to Avoid Further Violations

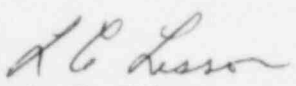
Procedure 9.1.1.4, "Special Work Permit", has been revised to allow SWPs to be extended beyond the expiration date. This extension may be up to, but not to exceed seven days. This was the original intent and the wording has been clarified to make this more evident.

Date When Full Compliance Will Be Achieved

We are presently in full compliance.

Please contact me if you have any questions concerning our response.

Sincerely,

for 
J. M. Pilant
Director of Licensing
and Quality Assurance

JMP:JVS:cg