



Nebraska Public Power District

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June 19, 1990

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

Subject: Followup Response to Inspection Report 50-298/89-34
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

- References:
- 1) Letter from S. J. Collins (NRC-Region IV) to G. A. Trevors (NPPD) dated May 10, 1990
 - 2) NRC Inspection Report No. 50-298/89-34, dated December 15, 1989
 - 3) Letter from G. A. Trevors (NPPD) to NRC dated January 22, 1990, "Response to NRC Inspection Report 50-298/89-34"
 - 4) Letter from G. A. Trevors (NPPD) to NRC dated April 6, 1990, "Followup Response to Inspection Report 50-298/89-34"
 - 5) Letter from S. J. Collins (NRC-Region IV) to G. A. Trevors (NPPD), dated April 5, 1990

Gentlemen:

In accordance with your May 10, 1990 request (Reference 1), the Nebraska Public Power District hereby provides: 1) a summary of the Nebraska Public Power District's (District's) completed audit of the Safeguards Information (SGI) control outside the District, and 2) a description of actions being taken to ensure expedient resolution of future District Quality Assurance (QA) audit observations and findings.

Background

During the period of October 16 - 19, 1989, the NRC performed an inspection of the District's physical security program for CNS. This inspection addressed, in part, the District's SGI protection program. The results of this inspection are documented in NRC Inspection Report 89-34 (Reference 2).

In Inspection Report 89-34 the NRC stated that, contrary to the District's Nuclear Power Group (NPG) Directive 4.2 "Protection of Safeguards Information," the District had not conducted random, periodic inspections of SGI control. By letter dated January 22, 1990 (Reference 3), the District provided its response to Inspection Report 89-34. That response indicated that the District's QA Department had identified, in March, 1989, a weakness in the implementation of NPG Directive 4.2, and had begun taking steps to

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address this issue. In Reference 3, the District also committed to complete its first round of random, periodic inspections of SGI protection by March, 1990.

On March 30, 1990, the District contacted the NRC-Region IV to request an extension to its earlier commitment to complete its audit of SGI protection by March, 1990. The District had, by this time, completed its audit of SGI control within the District, but requested an extension to complete the audit of SGI control for District contractors. During these discussions, the NRC-Region IV granted a 60 day extension and requested the District to document those discussions with a followup letter to NRC-Region IV. By letter dated April 6, 1990 (Reference 4), the District documented these discussions, and committed to complete its audits of SGI protection outside the District by May 31, 1990.

By letter dated April 5, 1990 (Reference 5), the NRC provided its followup response to the District's January 22, 1990 response to Inspection Report 89-34. That letter indicated the District's reply was responsive to the NRC's Notice of Violation. However, the letter indicated that the findings of the District's March, 1989 QA audit of NPG Directive 4.2 implementation had not been made available to the NRC Inspector during his inspection, and that the District's response raised concerns regarding the timeliness of its corrective actions with respect to this issue.

The NRC, by letter dated May 10, 1990 (Reference 1), confirmed the approval of the extension for completing SGI audits outside the District until May 31, 1990, and requested the District to provide a synopsis of this audit when completed. The NRC also reiterated the concern expressed in their April 5, 1990 letter regarding the timeliness of completing corrective actions for this matter, and requested that the District provide its actions planned to shorten the schedule for correction of future District identified violations. The following discussion provides the information requested above.

Summary of Contractor SGI Audit

The District has completed its SGI audit of each of its four contractors holding SGI. During these audits, the District identified two findings. These findings involve the failure to perform criminal history checks for all individuals with "need to know" access and the failure to revise their safeguards manual to comply with 10CFR73 versus NUREG-0794. Both findings were with the same contractor. As a result, the contractor has surrendered all SGI documents associated with Cooper Nuclear Station to the District until: 1) they receive the District's approval of their SGI program, or 2) they determine that these documents are no longer needed and may be destroyed.

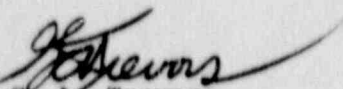
In addition, four observations were identified during the SGI audits which would clarify or enhance the respective SGI control programs. None of these observations were considered to effect the integrity of the SGI control programs evaluated.

Timeliness of Quality Assurance Corrective Actions

In response to this concern, the District has begun placing Quality Assurance Findings and Observations on the Nuclear Action Item Tracking (NAIT) system. Accordingly, status of corrective actions will become part of the District's weekly management meetings, and therefore, receive appropriate management attention through closeout of the concern. It is expected that all open QA findings/observations will be input into the system by August, 1990.

Please call if you have any questions.

Sincerely,



G. A. Trevors
Division Manager
Nuclear Support

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

NRC Resident Inspector
Cooper Nuclear Station