Nebraska Public Power District

COOPER NUCLEAR STATION
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November 7, 1994

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

Subject: Reply to an Inspector Concern
NRC Inspection Report No. 50-298/94-18
Cooper Nuclear Station, NRC Docket 50-298, DPP-46

Gentlemen:

The Nebraska Public Power District (District) hereby submits its response to a concern transmitted with NRC Inspection Report No. 50-298/94-18. This inspection report documents the results of the NRC inspection conducted by Messrs. R. A. Kopriva, W. C. Walker, and E. J. Ford from June 19 through July 30, 1994, on activities authorized at Cooper Nuclear Station (CNS). As part of this inspection, the NRC identified a concern with the performance of the Operations staff and the District was requested to address the concern, the corrective actions taken and their effectiveness. Per discussion with Phil Harrell (USNRC, Region IV), this was to be provided by November 4, 1994. This letter constitutes the District's response.

Statement of Concern

> "Of further concern was the performance of the operations staff on July 16, 1994, during the performance of integrated testing on the emergency diesel generators. As part of preplanned testing, forced circulation through the reactor core was to be suspended for 1 to 2 hours. Contrary to a senior management directive, operations unilaterally extended the flow interruption for more than 4 hours. Your site management was not informed. Upon learning of the situation the site manager temporarily suspended all non-essential site work to communicate his expectations to the plant staff".

District's Response

Prior to performance of Surveillance Procedure (SP) 6.3.4.3, the Plant Manager discussed restoration of Shutdown Cooling (SDC) with Operations management and Operations Support Group (OSG) personnel. The Plant Manager stated that the Site Manager expected that the reactor core should not be without forced circulation for greater than one hour. OSG personnel responded by saying that restoring SDC within one hour was not feasible with the procedure as written. It was discussed that it would take at least 30 to 45 minutes between the time SDC was secured

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until the loss of bus voltage was initiated, then additional time to perform restoration steps before SDC could be restarted per the procedure. During crew briefings, the expectation that forced circulation should not be stopped more than 1 to 2 hours was not communicated. The crews understood as general knowledge that the time forced circulation is stopped should be minimized, but were unaware of any expectation to notify management if it would be stopped for more than 1 or 2 hours.

During the night shift of July 16, 1994, SP 6.3.4.3 was performed on division 2 as written and the reactor was without forced circulation for 4 hours and 38 minutes. During the time that forced circulation was stopped reactor coolant temperature increased from approximately 110 degrees Fahrenheit to approximately 150 degrees Fahrenheit. This temperature rise was anticipated and not considered abnormal. Since no procedure or Technical Specification had been violated the operating crew did not make any special notifications.

On the morning of July 17, 1994, after the Site Manager became aware that his expectations had not been met, he suspended nonessential activities and held candid discussions with operations management and supervision and other station management that were on site. He clearly communicated his concerns for reactor safety and the importance of maintaining forced circulation. Performance of SP 6.3.4.3 on division 1 was suspended until the procedure could be revised to accommodate maintaining forced circulation.

The District admits the need to improve communications and notifications and has subsequently taken positive steps to inform plant personnel on the need for communication and to prescribe the proper and timely procedure to be used for notifications henceforth. Specifically, the actions taken include the following.

- The Site Manager met with station management and shift supervisors and clearly stated the District's position on the need for proper communication. This communication includes expectations as well as directives and the need for the Shift Supervisors to notify plant management of extraordinary activities and events.

- Surveillance Procedure 6.3.4.3 and Operating Procedure 2.2.69.2, RHR System Shutdown Operations, were revised prior to performance of SP 6.3.4.3 on division 1. These changes provide for maintaining forced circulation during the entire procedure. Revisions to both procedures add guidance with respect to the expectation for maintaining forced circulation when fuel is in the reactor pressure vessel and for informing the Plant Manager if it is anticipated that forced circulation will be out of service for greater than one hour.

- A change to Procedure 2.0.1, Plant Operations Policy, has been initiated that will require notification of the NRC Resident Inspector of any of the conditions requiring the Shift Supervisor to notify station management.

- Operations Instruction No. 6, Non-Emergency Plan Notifications, has been issued to require notification of station management, the STA, and the NRC Resident Inspector when implementing Procedure 2.0.1 (Section 8.4, NOTIFICATION) and for such other reasons as the loss of SDC or forced circulation during plant shutdown and when operational activities or conditions as determined by the Shift Supervisor warrant an increased awareness by station management.

Since these steps have been taken the District is unaware of any circumstances requiring notification that have not been satisfactorily communicated.

If there are any questions about this information, please call.

Sincerely,

J. H. Mueller
Site Manager

/nr
cc: Regional Administrator
USNRC - Region IV
Arlington, Texas

NRC Resident Inspector Office
Cooper Nuclear Station

NPG Distribution