



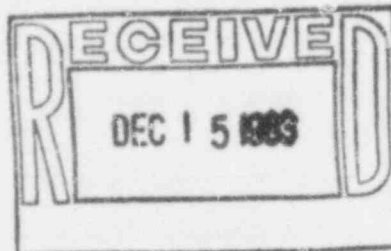
## Nebraska Public Power District

COOPER NUCLEAR STATION  
P.O. BOX 99, BROWNVILLE, NEBRASKA 68321  
TELEPHONE (402) 825-3811

CNSS838021

December 5, 1983

Mr. E. H. Johnson, Chief  
Reactor Project Branch 1  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011



Subject: NPPD Response to IE Inspection Report No. 50-298/83-27

Dear Mr. Johnson:

This letter is written in response to your letter dated November 8, 1983, transmitting Inspection Report No. 50-298/83-27. One item was identified after the inspection as being in violation of NRC requirements.

Following is a statement of violation, and our response in accordance with 10CFR2.201.

### Statement of Violation

#### "Failure to Conduct 12-Month Emergency Preparedness Program Review"

10CFR Part 50, Section 50.54(t) states that the licensee shall provide for a review of its emergency preparedness program at least every 12 months by persons who have no direct responsibility for implementation of the emergency preparedness program and that the review shall include an evaluation of adequacy of interfaces with state and local governments and of licensee drills, exercises, capabilities, and procedures.

Contrary to the above, the licensee failed to provide for an independent emergency preparedness program review, including all of the required review elements, during the period November 3, 1980, through October 7, 1983.

### Discussion

Prior to 1983, NPPD had reviewed the requirements of 10CFR50.54(t) and determined that the independent review required was within the

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the scope of QAP-1900 Audit, although it was not specifically addressed as such. Prior to performance of the 1983 QAP-1900 Audit, discussions with the NRC Inspector indicated that perhaps NPPD's compliance with 10CFR50.54(t) for past QAP-1900 Audits was marginal. As a result, an extensive effort was made to upgrade the scope of QAP-1900 to address the specific criteria outlined in 10CFR50.54(t).

Upon completion of the QAP-1900 Audit for 1983, NPPD viewed that compliance with 10CFR50.54(t) had been achieved. Subsequent discussions with the NRC Inspector, and as reported in the exit briefing for IE Inspection 83-27, this item was determined to be "unresolved" pending further review by the NRC. As a result of that review, the NRC has determined that NPPD's compliance to 10CFR50.54(t) is unsatisfactory. In acknowledgement of that final determination, NPPD is taking the following actions.

#### Corrective Steps Taken

Concurrent with the NRC review, and as a result of this item being termed "unresolved" during the exit briefing, NPPD has performed a subsequent review of the requirements in 10CFR50.54(t) utilizing the interpretation of the NRC Inspector. As a result of that review, it has been determined that the adequacy of interfaces with state and local governments will receive additional attention. In addition, a complete review of the 1983 50.54(t) evaluation will be performed utilizing the requirements of 10CFR50, Appendix E and the guidance provided by NUREG 0654. This evaluation will be completed by December 31, 1983. If inclement weather precludes completion by this date, the evaluation will be completed as soon as possible following that date. Should this be the case, the NRC will be advised.

#### Corrective Steps Which Will be Taken to Avoid Further Violation

Specific evaluation criteria developed as a result of this violation will be formalized and included as a unique section of QAP-1900. Future 10CFR50.54(t) evaluations will be performed within the required 12 month frequency, and not necessarily with the annual Emergency exercise.

#### Date of Full Compliance

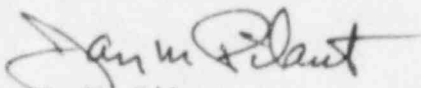
Upon completion of the scheduled evaluations conducted as indicated in the above "Corrective Steps Taken" section, the 1983 10CFR50.54(t) evaluation will be completed.

Mr. E. H. Johnson  
December 5, 1983  
Page 3

QAP-1900 revisions as indicated above will be completed by March 1, 1984.

If you have any questions in regard to this response, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. M. Pilant", with a stylized flourish extending from the end.

J. M. Pilant  
Technical Staff Manager  
Nuclear Power Group

VLW/GES:da