



Nebraska Public Power District

GENERAL OFFICE
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July 16, 1984
NLS8400018

Mr. John T. Collins
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Dear Mr. Collins:

Subject: NPPD Response to IE Bulletin 84-02,
"Failures of General Electric Type HFA
Relays in Use in Class 1E Safety Systems"

Herein is NPPD's response to IE Bulletin No. 84-02. All documentation discussed herein is available on site for I & E review.

If additional clarification of the enclosed information is necessary, please do not hesitate to contact me.

Sincerely,

L. G. Kuncel
Assistant General Manager - Nuclear

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cc: Document Control Desk
Washington, D.C. 20555

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Actions for All Holder of Operating
Licenses or Construction Permits:

Nebraska Public Power District
Response:

1. Plants in Operation

- a. Develop plans and schedules for replacing (1) nylon or Lexan coil spool-type HFA relays used in normally energized safety-related applications and (2) nylon coil spool-type HFA relays used in normally de-energized safety-related applications. The replacement relays and any replacements made in the future should meet the requirements of the applicable IEEE standards. The replacement program for energized and de-energized relays should be performed on a "best efforts" basis during plant outages of sufficient duration. The entire replacement program should be completed within two years from the date of this bulletin.

The District will change out all HFA relays associated with safety-related systems at Cooper Nuclear Station during the Fall 1984 refueling outage.

- b. During the period before relay replacement, develop and implement surveillance plans that include:

- (1) Monthly functional tests of all reactor trip system normally energized relays that verify relay contacts change state when the relay coil is de-energized;

Cooper Nuclear Station currently performs monthly functional tests of all reactor trip system normally energized relays.

Actions for All Holder of Operating
Licenses or Construction Permits (Cont.):

- (2) Visual inspections of all safety-related normally energized relays as soon as practical upon receipt of this bulletin. Thereafter, similar inspections should be accomplished in conjunction with the monthly functional test. These visual inspections should verify that relay coils are not deteriorating (e.g., inspect coil bobbins for visible cracks or melting), and should confirm cleanliness of the relay pole pieces.
- c. Provide a basis for continuing operation for the period of time until the normally energized relays are replaced. This basis should include a discussion of those measures addressed Items 1a and 1b and any other preventive and/or corrective measures taken or planned.

Nebraska Public Power District
Response (Cont.):

Cooper Nuclear Station has completed the visual inspection of all safety-related normally energized relays. Visual inspection of the safety-related normally energized relays will continue on a routine basis and during monthly functional tests.

The District is very aware of the safety implications of the HFA relay problem. In fact, prior to issuance of IE Bulletin 84-02, Cooper Nuclear Station, assisted by General Electric, had electrically tested all safety-related HFA relays with satisfactory results. The "Century Series" replacement relays for an entire change-out are on site. Cooper Nuclear Station will continue monthly visual and functional checks to ensure operability of the reactor trip system normally energized relays. In conclusion, it is the District's contention that the previous and ongoing evaluation and testing of safety-related HFA relays at Cooper Nuclear Station will ensure that the necessary electrical systems would be available to mitigate the consequences of a failure of a reactor trip function.

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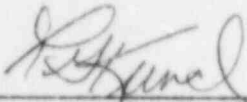
In response to the staff's request (on page 5 of the subject IE Bulletin 84-02) that the District review general concerns expressed in the bulletin pertaining to relays other than GE HFA nylon or Lexan-type relays, the District will proceed to conduct such a review of relays with safety-related functions, past operating history, and manufacturer's recommendations, to determine if additional action is appropriate. The results of the above review and related short-term and long-term corrective actions to be taken and the schedule thereof (if required) will be submitted to the NRC within 90 days of the date of this letter.

To facilitate the NRC's evaluation of the cost of this bulletin, the staff time required to perform the review relevant to the GE HFA nylon or Lexan-type relays was approximately 60 hours. Staff time spent to prepare the requested documentation was approximately 15 hours.

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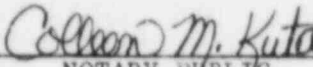
STATE OF NEBRASKA)
) ss
PLATTE COUNTY)

L. G. Kunc1, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this information on behalf of Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.



L. G. Kunc1

Subscribed in my presence and sworn to before me this 16th day of
July, 1984.



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