

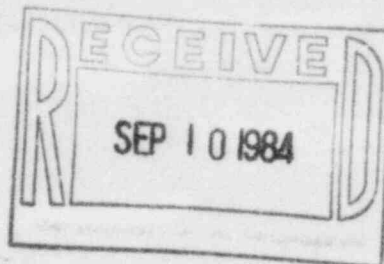


Nebraska Public Power District

GENERAL OFFICE
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NLS8400004

September 4, 1984



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

Subject: NPPD Response to IE Inspection Report No. 50-298/84-12

Dear Mr. Collins:

This letter is written in response to your letter dated August 15, 1984 transmitting Inspection Report No. 50-298/84-12. Therein you indicated that one of our activities was in violation of NRC requirements.

The following is the statement of the violation and our response in accordance with 10 CFR 2.201:

Statement of Violation

Transportation of Licensed Material

10 CFR Part 71.5(a), "Transportation of Licensed Material", requires that no licensed material shall be transported outside of the confines of the licensee's plant unless the requirements of the regulations appropriate to the mode of transportation of the Department of Transportation in 49 CFR Parts 170 through 189 are met. 49 CFR Part 173.441(b) (3) states that the radiation dose rate shall not exceed 10 millirem per hour at any point 2 meters (6.6 feet) from the vehicle planes represented by the outer lateral surfaces of the vehicle.

Contrary to the above, on May 10, 1984, a shipment of licensed material received at the Beatty, Nevada, low-level waste site was found by a state of Nevada inspector to have a radiation dose rate at 2 meters from either side of the trailer in excess of 10 millirem per hour.

This is a Severity Level III Violation. (Supplement V) (298/8412-01)

Corrective Steps Which Have Been Taken and the Results Achieved

Station procedures have been revised to require an independent second check of radiological data to ensure that shipments are not made which exceed

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established limits. In addition, quality control checks have been added to checklists which are used to administratively control radioactive waste shipment.

Personnel who are directly involved in the shipping of radioactive waste were trained on the revised station procedures for LSA waste shipments on July 5, 1984. In addition, the Chemistry and Health Physics Supervisor, a Lead Health Physics Technician, a Health Physics Technician and a Quality Assurance Specialist received refresher training by attending U. S. Ecology's course on "Packaging and Transportation of Radioactive Materials" during the week of August 20, 1984.

The involvement of Station Quality Assurance in radioactive waste shipping was increased such that a surveillance is performed on every shipment prior to it leaving the site (as opposed to the previous policy of a monthly surveillance). This third level of checking is intended to further minimize any personnel errors associated with waste shipments. This increased surveillance will be applied for one year (approximately 75-80 shipments), at which time consideration will be given to reducing the frequency.

Lastly, Nebraska Public Power District employed Nevada Inspection Services, Inc. to conduct eleven inspections of radioactive waste shipments made subsequent to the noted violation. These inspections verified that no significant deviations from the revised shipping procedures occurred.

On August 13, 1984, the suspension on Cooper Nuclear Station's radioactive waste permit was terminated by the State of Nevada Bureau of Regulatory Health Services, based on improved performance.

Corrective Steps Which Will Be Taken To Avoid Further Violations

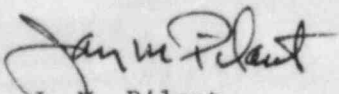
Increased management attention will continue to be directed in the area of radioactive waste shipments in order to lower the margin for personnel error.

Date When Full Compliance Will Be Achieved

Cooper Nuclear Station is presently in full compliance and has resumed shipping radioactive waste to Beatty, Nevada.

If you have any questions regarding this response, please contact me or P. V. Thomason at the site.

Sincerely,



J. M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP:RLB:ya

cc: R. L. Beilke