



Nebraska Public Power District

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NLS960034
March 14, 1996

Director, Office of Enforcement
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

Subject: Reply to a Notice of Violation;
NRC Inspection Report No. 50-298/95-17;
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

- References: 1. Letter from Mr. J. E. Dyer (USNRC) to Mr. G. R. Horn (NPPD), dated February 5, 1996, NRC Inspection Report 50-298/95-17 and Notice of Violation.
2. LER 95-022-01, "Reactor Trip Signal, ESF Actuation, and Loss of Shutdown Cooling Due to Inadequate Work Planning and Control."

This letter, including Attachment 1, constitutes Nebraska Public Power District's (the District's) reply to the referenced Notice of Violation in accordance with 10 CFR 2.201. Per telecon of March 6, 1996, with the NRC Branch Chief, additional time after the required 30 days from the date of the letter transmitting the Notice of Violation was granted for submitting this response.

Inspection Report 50-298/95-17 documented the results of an NRC inspection conducted from November 12 through December 23, 1995, of the Cooper Nuclear Station (CNS) facility. The report documented two violations of NRC requirements. The District admits to the violations and has completed the corrective actions necessary to return CNS to full compliance with regard to 10 CFR Part 50, Appendix B, Criterion V.

Should you have any questions concerning this matter, please contact my office.

Sincerely,

J. H. Mueller
Site Manager

cct/

Attachment

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cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC - Cooper Nuclear Station

NPG Distribution

REPLY TO FEBRUARY 5, 1996, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from November 12 through December 23, 1995, two violations of NRC requirements were identified. The particular violations and the District's reply are set forth below:

- A. "10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by procedures appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Procedure 0.45, "Foreign Material Exclusion Program," Revision 2.2, requires the following:

- [1] Step 8.2.3 states that appropriate precautions shall be taken to prevent the intrusion of foreign material into systems and components.
- [2] Step 8.2.18 states that, before an existing foreign material exclusion area can be removed, all items entered on the foreign material exclusion area logs must be accounted for.
- [3] Step 8.2.15 states that all tools and parts entering a foreign material exclusion area shall be in good repair and visibly clean of debris, shipping plugs, and preservatives.

Contrary to the above:

- [1] On November 15, 1995, the inspector identified that appropriate precautions to prevent the entry of foreign material into the torus were not taken in that the inspector identified shims, plastic covers, drop lights, and other foreign material in the drywell downcomers.
- [2] On November 30, 1995, the inspector identified that, inconsistent with Step 8.2.18 of Procedure 0.45, Procedure 2.0.10, "Primary Containment Access Control," Revision 5.1 did not require that foreign material logs for the torus be reconciled prior to closeout of the torus.
- [3] On December 5, 1995, tools and parts entering a foreign material exclusion area were not clean of debris in that paint chips were found in a main steam line isolation valve after the licensee had performed a flush of the valve with water. The hose used to perform the flush was determined to be the source of the foreign material.

Admission or Denial to Violation

The District admits the violation.

Reasons for Violation

Refueling Outage (RE16) was the first outage where Administrative Procedure 0.45, "Foreign Material Exclusion Program," was implemented and consequently several inadequacies were identified in the implementation of this procedure and the FME program.

Collectively, the three cited examples resulted due to personnel in responsible FME positions not having sufficient practical training or experience. Contributing to the third example was the lack of a cleanliness control program interface to the FME program to preclude the use of equipment that did not meet cleanliness requirements.

Corrective Steps Taken and the Results Achieved

1. The drywell downcomers were cleaned of foreign material prior to containment closeout.
2. Procedure 2.0.10 was revised to include a sign-off for the reconciliation of the FME log prior to torus close out.
3. CNS Directive 2, "Site Work Practices," and Procedure 0.45, "FME Program," were revised to specify that hoses used in FME applications are flushed to provide assurance that they have the appropriate level of cleanliness.

Corrective Steps That Will Be Taken to Avoid Further Violations

1. As committed to in response to Information Bulletin 95-02, the District will review the FME Program and revise it as appropriate to enhance its effectiveness. Additionally, the following actions will be taken:
 - a. Upgrading FME procedures to more clearly define practical program requirements (June 28, 1996).
 - b. Upgrading training requirements to help ensure consistent practical application of FME program requirements (August 29, 1996).
2. A cleanliness procedure that effectively interfaces with the FME program will be developed and implemented (June 28, 1996).

Date When Full Compliance Will Be Achieved

The District is in full compliance with the requirements of 10 CFR Part 50, Appendix B, Criterion V, with respect to the identified examples.

- B. 10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by procedures appropriate to the circumstances and shall be accomplished in accordance with these procedures.

Contrary to the above:

- [1] On December 13, 1995, Procedure 14.4.4, "Instrument Sensing Line Backflush/Backfill," Revision 1.1, was not appropriate to the circumstances in that the procedure directed the maintenance technicians to backfill both the low and high side of a differential pressure instrument, when the scope of the work was only to backfill the low side. This resulted in the plant receiving a full scram signal and Groups 2, 3, and 6 isolations.
- [2] On December 14, 1995, Procedure 6.1DG.302, "Undervoltage Logic Functional, Load shedding, and Sequential Loading Test," Revision 0.1, was not appropriate to the circumstances in that the procedure incorrectly provided instructions for the removal of a jumper across the service water supply valve in Step 8.2.208, when the jumper should have been removed prior to Step 8.2.76. This resulted in Diesel Generator 1 tripping on high connecting rod bearing temperature.
- [3] On December 3, 1995, the licensee determined that Procedure 1.11, "Equipment Spare Parts Inventory Program," lacked controls to preclude diesel generator fuel injectors that were not of the same form and fit from being assigned the same identification code. Consequently, two fuel injectors, which were not mechanically compatible with the fuel supply system, were released from the warehouse and installed on Diesel Generator 2.

Admission or Denial to Violation

The District admits the violation.

Reasons for Violation

Individually, the cause of the cited examples were:

- 1. The cause of the first example was inadequate work planning and review, in that the scope of the maintenance activity was not identified in the work control documents for backfilling the reference leg.
- 2. Personnel preparing the procedure change and performing the verification and validation were not sufficiently knowledgeable of the function of the relay. Verification and validation technical requirements were not adequately specified by procedure.
- 3. Procedures controlling the spare parts inventory and assignment of spare part numbers did not specify requirements for the situation described in the example cited in the violation.

Corrective Steps Taken and the Results Achieved

1. The Plant Manager stopped work and conducted a briefing for plant personnel on the event, the importance of "stopping in the face of uncertainty," and recognizing opportunities to prevent similar problems. Additionally, the CNS outage newsletter was used to disseminate lessons learned from the event. This action increased station personnel awareness and reinforced management expectations. Additionally, Procedure 14.4.4 was revised to preclude its use on level, pressure, or flow instruments within the primary coolant system.
2. Procedures 6.1DG.302 and 6.2DG.302 were revised to correct the improper step sequence.
3. The parts were identified and separated into the correct CNS numbers. Part numbers and purchase orders were identified and referenced in the CNS number. Equipment spare part inventory and procurement procedures were revised to require engineering documentation for new CNS numbers and supplier or manufacturing part number changes in procurement documents.

Corrective Steps That Will Be Taken to Avoid Further Violations

1. CNS procedures will be developed to improve work instructions for backfilling level, pressure, or flow instruments within the primary coolant system (June 28, 1996).
2. The station design change procedure will be revised to enhance the delineation of responsibilities and qualifications regarding development, review, and verification of procedures affected by station modifications (June 28, 1996).
3. Maintenance and Engineering procedures will be evaluated to determine if the proper level of detail is specified as balanced against supervisory oversight and personnel training qualifications (June 21, 1996). A schedule for revising procedures determined to need enhancement will be developed based on safety significance.

Further enhancements to the Work Control process were committed to in LER 95-022-01:

- Training will be provided to maintenance planners to enhance their ability to identify and develop post maintenance testing requirements.
- The CNS Maintenance Manager will initiate a review of this event to determine possible enhancements to the maintenance planning and review process.

Date When Full Compliance Will Be Achieved

The District is in full compliance with the requirements of 10 CFR Part 50, Appendix B, Criterion V, with respect to the identified examples.

Correspondence No: NLS960034

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
Upgrade FME procedures to more clearly define practical program requirements.	June 28, 1996
Upgrade training requirements to help ensure consistent practical application of FME program requirements.	August 29, 1996
Develop and implement a cleanliness procedure that effectively interfaces with the FME program.	June 28, 1996
Maintenance and Engineering procedures will be evaluated to determine if the proper level of detail is specified as balanced against supervisory oversight and personnel training qualifications.	June 21, 1996
A schedule for revising Maintenance and Engineering procedures determined to need enhancement will be developed based on safety-significance.	
CNS procedures will be revised to improve work instructions for backfilling safety-related differential pressure instruments.	June 28, 1996
Station modification procedures will be revised to enhance the delineation of responsibilities and qualifications regarding procedure development, review, and verification of procedures affected by station modifications.	June 28, 1996