



## Nebraska Public Power District

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CNSS926741

September 18, 1992

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

Gentlemen:

Subject: NPPD Response to Inspection Report 50-298/92-11 (Reply to a Notice of Violation)

During an NRC Site inspection of plant procedures and concerns related to emergency operating procedures conducted July 20-24, 1992, a violation of NRC requirements was identified. The violation involved the failure to maintain appropriate plant procedures. Following is a statement of the violation and our response thereto in accordance with 10CFR2.201.

### Statement of Violation

Technical Specification 6.3.2 states that, "Written procedures and instructions including applicable check off lists shall be established, implemented, and maintained for the following: ...

"C. Emergency conditions involving possible or actual releases of radiation materials."

Emergency Support Procedure ESP-5.8.11, "RPV Venting During Primary Containment Flooding," was written to address a plant emergency condition.

Contrary to the above, Procedure ESP-5.8.11 was not maintained, in that, on April 1, 1992, the licensee identified three cases in which procedural steps would not have worked under certain accident conditions, and the procedure was not revised to correct the discrepancies.

This is a Severity Level IV violation (298/9211-01) (Supplement I).

### Reason for Violation

Emergency Support Procedure ESP-5.8.11 was not maintained in that procedural deficiencies identified during the EOP Support Procedure Verification process were not corrected in a timely manner. This was due to the CNS EOP Maintenance Program not providing a process for expediting either temporary or permanent procedure changes to individual Emergency Support Procedures.

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Corrective Steps Taken and the Results Achieved

Prior to this Inspection, the CNS EOP Maintenance Team was in the process of revising Procedure 0.22, "Emergency Operating Procedure Maintenance Program" to provide a means for expediting procedure changes to the EOPs. Subsequent to discussions with the NRC inspector who identified the procedural deficiency, this work was accelerated. On July 23, 1992, Procedures 0.22 (Revision 5) and 0.22.1, "EOP Temporary Procedure Changes" (Revision 0) were approved. These revised procedures streamline the EOP revision process by allowing for both temporary and permanent revision of individual Emergency Support Procedures.

On July 24 an EOP Temporary Change was performed on Procedure ESP-5.8.11 to correct the technical deficiencies.

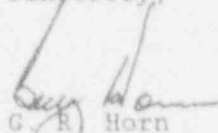
Corrective Steps Which Will Be Taken To Avoid Further Violations

To ensure that EOPs and their support procedures are maintained, Procedure 0.22 will be revised to provide additional guidance for assigning priority for procedure revision. This guidance will identify Emergency Support Procedures that contain technical errors as requiring immediate revision. This change, in conjunction with existing Procedure 0.22.1, will provide timely procedure revisions.

Date When Full Compliance Will Be Achieved

NPPD is currently in compliance with the requirements stated in the violation. The follow-up action identified above will be completed by December 25, 1992. Should you have any questions regarding this matter, please contact me.

Sincerely,



G. R. Horn  
Nuclear Power Group Manager

GRH:db:js

cc: Regional Administrator  
U. S. NRC - Region IV

NRC Resident Inspector  
Cooper Nuclear Station