



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS960187
October 9, 1996

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. 50-298/96-13
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from J. E. Dyer (USNRC) dated
September 9, 1996, "NRC Inspection Report 50-298/96-13 and Notice of
Violation"

By letter dated September 9, 1996 (Reference 1), the NRC cited Nebraska Public Power District (District) as being in violation of NRC requirements. This letter, including Attachment 1, constitutes the District's reply to the referenced Notice of Violations in accordance with 10 CFR 2.201. The District admits to the violations and has completed all corrective actions necessary to return CNS to full compliance with respect to the identified violations.

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

Sincerely,

P. D. Graham
Vice President - Nuclear

/cct
Attachment

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October 9, 1996
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cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

REPLY TO SEPTEMBER 9, 1996, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from June 16, 1996, through July 27, 1996, 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, states, in part, that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions or procedures."*

Procedure 7.11, 'Reactor Building Roof Access Hatch Operation and Maintenance,' Revision 2.1, Step 7.5, requires Shift Supervisor signature and date on an attachment of the procedure prior to accessing the reactor building roof via the reactor building hatch. Step 9.1 requires that, during hatch restoration, Operations verify that the reactor building hatch was closed, sealed tight, and locked.

Contrary to the above:

On June 19, 1996, a security officer, a radiation protection technician, and two engineers opened the reactor building hatch without the shift supervisor's approval. As of June 20, 1996, the reactor building hatch had not been verified by Operations to be restored.

- B. *10 CFR Part 50, Appendix B, Criterion V, states, in part, that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions or procedures. Procedure 2.0.1, 'Plant Operations Policy,' Revision 27, Step 8.4.2, states that approved procedures require step-by-step adherence by all personnel.*

Contrary to the above, the following procedures were not adhered to step by step:

- 1. On June 15, 1996, Section 8.2 of Procedure 4.15, 'Elevated Release Point and Building Radiation Monitoring Systems,' Revision 14, was performed without performing Section 8.1 where the step to open the suction valve was located. Procedure 4.15 does not state that each section can be performed independently.*
- 2. On April 10, 1996, Step 8.10.2.4, to open the pump suction valve, of Procedure 6.4.6.4.1, 'Turbine Building Kaman Monitor Calibration,' Revision 5, was not performed, resulting in the turbine building radiation monitor being returned to operable status with the pump suction valve closed.*
- 3. On July 14, 1996, maintenance technicians, while performing Procedure 7.2.55.1, 'Replacement of HCU Accumulator,' Revision 2, removed the cart before directed by Step 8.5 and before the fasteners were torqued.*

4. *On July 11, 1996, while performing Procedure 6.1EE.302, '4160v Bus 1F Undervoltage Relay and Relay Timer Functional Test,' Revision 0, the operator logged the allowed outage stop time at Step 8.187 instead of Step 8.189."*

Admission or Denial to Violations

The District admits the violations.

Reason for Violation A.

This violation resulted from personnel failing to implement Procedure 7.11 due to an unawareness of procedural control of the secondary containment hatch, lack of signage indicating requirements for access and egress, and the lack of a questioning attitude by the personnel involved.

Corrective Steps Taken and the Results Achieved - Violation A.

Operations immediately declared Secondary Containment inoperable and entered the Technical Specification 3.7.C action statement. Within three hours Operations performed Surveillance Procedure 6.SC.502 to verify the integrity of the reactor building hatch prior to declaring secondary containment operable. The unescorted badges of the two engineering contractors were withheld pending a review of the event. The badges have since been reactivated. Placards were placed on the ladder leading to the hatch and on the hatch indicating that the hatch is a secondary containment boundary and that the requirements of Procedure 7.11 must be met before opening the hatch. Security Procedure 2.8 was revised to require Security Shift Supervisor approval of issuing the reactor building roof hatch key after coordination with the Station Shift Supervisor.

Corrective Steps That Will Be Taken to Avoid Future Violations - Violation A.

No further corrective actions are required.

Reason for Violation B.

Collectively, the four examples resulted from personnel failing to follow procedure.

Corrective Steps Taken and the Results Achieved - Violation B.

On July 25, 1996, CNS stopped plant work and training activities so that departmental meetings could be held to focus attention on current problems regarding procedural compliance. Several issues were identified during this meeting and are being resolved through the corrective action process. The stand down continued until departmental managers were confident that expectations regarding procedural compliance were clearly communicated and understood.

The specific procedural violations are being discussed with personnel from the applicable departments.

Corrective Steps That Will Be Taken to Avoid Future Violations - Violation B.

1. Procedure 4.15 will be revised by November 19, 1996, to create independent sections for placing either the normal or high range monitors in service.
2. Kaman calibration procedures will be revised by December 3, 1996, to include specific check offs or initials when component manipulations are performed.
3. The crew leader was counseled regarding this event and no further corrective steps are required.
4. Allowed Outage Time implementation guidance will be reviewed for appropriate application by December 11, 1996.

Date When Full Compliance Will Be Achieved

The District has completed all corrective actions necessary to return CNS to full compliance with respect to the identified violations.

Correspondence No: NLS960187

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
Procedure 4.15 will be revised to create independent sections for placing either the normal or high range monitors in service.	November 19, 1996
Kaman calibration procedures will be revised to include specific check offs or initials when component manipulations are performed.	December 3, 1996
Allowed Outage Time implementation guidance will be reviewed for appropriate application.	December 11, 1996