



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS960183
September 23, 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. 50-298/96-15
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from K. E. Brockman (USNRC) dated
August 22, 1996, "NRC Inspection Report 50-298/96-15 and Notice of
Violation"

By letter dated August 22, 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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cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

REPLY TO AUGUST 22, 1996, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from July 29, 1996, through August 2, 1996, two violations of NRC requirements were identified. The particular violations and the District's reply are set forth below:

A. *"Criterion V of Appendix B to 10 CFR Part 50 states, in part, that activities affecting quality shall be prescribed by documented procedures, of a type appropriate to the circumstances, and shall be accomplished in accordance with these procedures.*

- *Procedure 9.1.1.3, 'Personnel Dosimeter Program,' Revision 38, Section 8.1.1.4.a, states in part, 'DRD's shall be available to all personnel entering the RCA. DRD's are to be used in addition to thermoluminescent dosimeters (TLD) and not in lieu of TLD's.....'*
- *Procedure 9.1.5, 'Respiratory Protection Program,' Revision 31, Section 8.9.2, states in part, 'This examination shall include [that]: Sorbent canisters are sealed and within their 3 year shelf life.'*

Contrary to the above,

- *Between November 1995 and May 1996 workers entered the radiological controlled area during six separate occurrences without the proper dosimetry.*
- *On July 31, 1996, the inspectors identified that the monthly examination of respiratory equipment did not identify that sorbent canisters exceeded the procedural shelf life requirement.*

B. *10 CFR 20.1501 states, in part, (a) Each licensee shall make or cause to be made surveys that - (1) May be necessary for the licensee to comply with the regulations in this part; and (2) Are reasonable under the circumstances to evaluate - (i) The extent of the radiation levels; and (ii) Concentrations or quantities of radioactive material; and (iii) The potential radiological hazard that could be present.*

Contrary to the above, on June 8, 1996 and June 18, 1996, work was performed in the dryer/separator pit and refueling pool area of the reactor building, without performing surveys to evaluate the radiological hazards present."

Admission or Denial to Violations

The District admits the violations.

Reason for Violation A.

The first example resulted from personnel failing to follow procedure. The identified six entries without direct reading dosimeters were from a population of approximately 175,000 RCA entries during this time period. All personnel were wearing TLDs to record their radiation dose.

The second example resulted from an inadequate initial evaluation of a corrective action from a self-assessment. It was not recognized at the time of the self-assessment that the discrepancy between the procedure and form was a compliance issue.

Corrective Steps Taken and the Results Achieved - Violation A.

Present RCA access controls were evaluated and it was determined that the present process provides excellent tracking of personnel dose. Management expectations regarding dosimetry requirements for RCA entry were re-emphasized to station personnel to increase their sensitivity to the issue.

The procedure identified in the second example was revised to reflect manufacturer recommendations regarding the shelf life of the sorbent canisters and the inspection form now accurately reflects procedural requirements.

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

Subsequent to the inspection, three additional RCA entries without DRDs were identified. The District will evaluate the human performance aspects of this issue and implement additional corrective measures if warranted based on that evaluation. CNS will continue to evaluate similar circumstances through the Corrective Action Program and take actions for any future adverse trends identified regarding the first example. The District will also review present personnel dosimetry requirements.

Reason for Violation B.

Both events occurred due to a complacency with respect to procedural requirements for radiological protection (RP) personnel involved. RP personnel had not adequately scoped the current conditions of the two jobs which resulted in erroneous assumptions and the failure to recognize potential radiological hazards.

Corrective Steps Taken and the Results Achieved - Violation B.

Subsequent to the second event, the project supervisor suspended work on the fuel pool cleanup project until the initial investigation could be conducted and a restart plan developed. A briefing on the event and the results of the investigation was held with the contract work force and RP personnel. This briefing included the actions necessary for work restart.

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

Training on procedures, basic survey techniques, basic job coverage techniques, and management expectations related to this violation will be provided to the appropriate personnel by December 31, 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: NLS960183

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
The District will evaluate the human performance aspects of RCA entries without DRDs and implement additional corrective measures if warranted based on that evaluation.	
The District will review present personnel dosimetry requirements.	
Training on procedures, basic survey techniques, basic job coverage techniques, and management expectations related to this violation will be provided to the appropriate personnel.	December 31, 1996