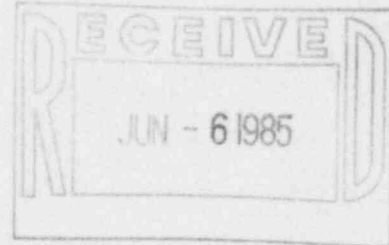


Nebraska Public Power District

GENERAL OFFICE
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TELEPHONE (402) 564-8561

CNSS853146
May 30, 1985



Mr. R. D. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: Licensed Operator Requalification Examinations

Reference: (1) Letter from E. Johnson (NRC) to L. Kuncel (NPPD), dated
May 8, 1985
(2) Letter from J. Weaver (NPPD) to B. Siegel (NRC), dated
December 30, 1983

Dear Mr. Martin:

The purpose of this letter is to request an exemption from the requirement regarding administration of the subject examination during 1985 within the normally accepted annual time frame specified in the Cooper Nuclear Station USAR, Chapter XIII, Paragraph 3.4.1.3. Instead, CNS proposes to conduct the examination in August and September of this year, during five (5) successive weeks, commencing the week of August 5. As specified in Reference 1, arrangements have been made with Mr. Ralph Cooley of your office for NRC personnel to administer NRC requalification examinations at CNS during the week of August 19, coincident with the District's exam schedule.

The District requests that the NRC grant this exemption request based upon the following justification:

- 1) The reactor has been shut down since September 15, 1984 to effect Reactor Recirculation System pipe replacement and is not expected to return to power until late in July. Preparations for pipe replacement activities, requiring licensed operator personnel on shift, and subsequent restoration activities, have required the Licensed Operator Requalification Program to be interrupted approximately fifteen (15) weeks.
- 2) In preparation for the extensive fuel handling activities anticipated during the current outage, licensed operator personnel attended training associated with refueling floor activities at the General Electric Training Center in San Jose, California, which consumed an additional five (5) weeks.

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- 3) The District committed to the NRC, in Reference 2, to develop and implement Emergency Operating Procedures (EOPs) by September 30, 1985. As a result, extensive training, consuming an additional eight (8) weeks, has been conducted for licensed operators during this requalification cycle so as to assure effective implementation.

The impact of these activities was identified early-on during scheduling of the Requalification Program and has been discussed on several occasions with Mr. Cooley. As a result of these discussions, the District hereby submits this one time exemption request. Specifically, the District requests an extension of four months in order to complete the requirements of our Licensed Operator Requalification Program.

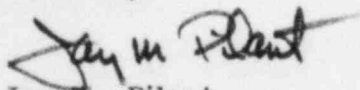
Actions which have been or are being taken by the District associated with the Licensed Operator Requalification Program during this requalification cycle, all of which will be completed prior to start-up, include the following:

- 1) The amount of time devoted per shift cycle to training was increased from four (4) to five (5) days for several shift cycles to ensure that required classroom training could be completed.
- 2) The portion of requalification training conducted in the General Electric simulator at Morris, IL was scheduled early during this requalification cycle and was combined with simulator EOP training so as to assure that the required number of reactivity changes per training cycle were completed and that required transient training would be accomplished utilizing the EOPs.
- 3) The Licensed Operator Requalification Program lecture series has been improved by increasing the emphasis and commitment of classroom training in the areas of emergency preparedness and design changes. The District believes that these efforts are symptomatic of the efforts being made to improve the Licensed Operator Requalification Program and aids in providing assurance that safe operation of the station can be maintained.

In addition to the actions above, an extensive pre-startup test program has been developed to assure correct component and system operation subsequent to this major outage. By its nature, this program will be beneficial to safe operation of the station, due to an increased level of operator action required to execute the numerous testing activities.

If you should require further information or wish to discuss additional items related to the Licensed Operator Requalification Program or our basis for this request, please contact Mr. Donald L. Reeves, Jr., CNS Training Manager, at 402-825-3811.

Sincerely,



Jay M. Pilant
Technical Staff Manager
Nuclear Power Group

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