



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS970003

January 27, 1997

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. 50-298/96-26
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to Horn (NPPD) from Dyer (USNRC) dated December 26, 1996, "NRC
Inspection Report 50-298/96-26 and Notice of Violation"

By letter dated December 26, 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 Violation in accordance with 10 CFR 2.201. The District admits to the violation and has completed all corrective actions necessary to return CNS to full compliance.

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

Sincerely,

P. D. Graham
Vice President - Nuclear

/cct
Attachment

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January 24, 1997

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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 DECEMBER 26, 1996, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted on October 20 through November 30, 1996, one violation of NRC requirements was identified. The particular violation and the District's reply are set forth below:

Violation

"Technical Specification 4.5.F.1.c states, in part, when it is determined that one diesel generator is inoperable, to determine within 24 hours that the operable diesel generator is not inoperable due to common cause failure or perform Technical Specification Surveillance Requirement 4.9.A.2.a.1.

On October 21, 1996, Diesel Generator 2 was declared inoperable due to a fuel oil leak on the supply line to Injector 7L.

On October 23, 1996, during the postmaintenance test on Diesel Generator 2, the motor-operated potentiometer failed, causing the diesel to drop load.

Contrary to the above, for the two above failures, the licensee did not determine within 24 hours that the operable diesel generator was not inoperable due to common cause failure and did not perform Technical Specification Surveillance Requirement 4.9.A.2.a.1 (to run the operable diesel generator) within 24 hours."

Admission or Denial to Violation

The District admits the violation.

Reason for Violation

The surveillance requirement of Technical Specification 4.5.F.1.c was implemented in Amendment 175 to the CNS operating license on April 29, 1996. Administrative controls for documenting the required common cause failure analysis were not developed. This violation resulted from the failure of management to adequately communicate expectations through the development or initiation of administrative controls for the staff to implement the Technical Specification 4.5.F.1.c surveillance requirement regarding documentation of a common mode failure analysis.

Corrective Steps Taken and the Results Achieved

In both examples, Operations personnel were aware of the Technical Specification surveillance requirement. Common mode failure analyses that determined Diesel Generator 1 was operable were performed but not documented. Common mode failure evaluations were subsequently documented for both occurrences of Diesel Generator 2 inoperability. Both evaluations indicated Diesel Generator 1 was not inoperable due to a common cause.

Other occurrences of diesel generator inoperability since the Technical Specification surveillance requirement was implemented were reviewed for other examples of undocumented common cause failure analyses. No other examples were found.

Operations Management discussed this violation with all Shift Supervisors and Shift Technical Engineers to communicate expectations regarding review and documentation of Technical Specification requirements.

Additionally, the Tech Spec Tracker program has been revised to prompt personnel to perform and document the common cause failure analysis required when a Diesel Generator becomes inoperable.

Corrective Steps That Will Be Taken to Avoid Further Violations

Administrative controls are being evaluated to provide a consistent mechanism to document common mode failure analyses.

Date When Full Compliance Will Be Achieved

The District is in full compliance with respect to the identified violation.

Correspondence No: NLS97003

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
Administrative controls are being evaluated to provide a consistent mechanism to document common mode failure analyses.	