

## Nebraska Public Power District

COOPER NUCLEAR STATION  
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NLS960196  
October 30, 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. 50-298/95-18  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from L. J. Callan (USNRC) dated September 30, 1996, "NRC Inspection Report 50/298/95-18 and Notice of Violation"

By letter dated September 30, 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.

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

Sincerely,

G. R. Horn  
Sr. Vice President of Energy Supply

/nr  
Attachment

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

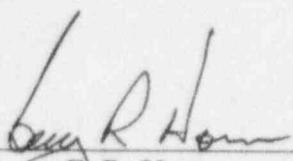
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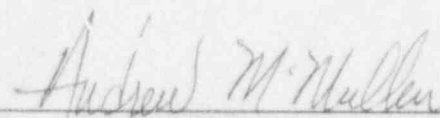
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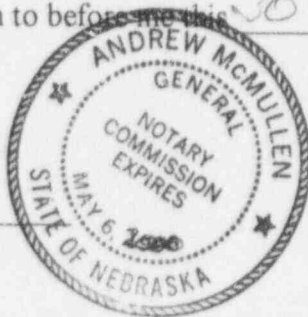
STATE OF NEBRASKA     )  
                                      )ss  
NEMAHA COUNTY         )

G. R. Horn, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this correspondence on behalf of Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
G. R. Horn

Subscribed in my presence and sworn to before me this 30 day of OCTOBER, 1996.

  
\_\_\_\_\_  
NOTARY PUBLIC



REPLY TO SEPTEMBER 30, 1996, NOTICE OF VIOLATION  
COOPER NUCLEAR STATION  
NRC DOCKET NO. 50-298, LICENSE DPR-46

During an NRC investigation concluded on May 8, 1996, three violations of NRC requirements were identified. The particular violations and the District's reply are set forth below:

Violation A.

*10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that, "Activities affecting quality shall be...accomplished in accordance with these instructions, procedures, and drawings."*

*Step 8.2.6 5 of Cooper Nuclear Station Operations Manual, "Conduct of Operations Procedure 2.0.3, "Revision 20, dated August 21, 1995, states, "Operators should notify the control room supervisor and shift supervisor of any unexpected situations encountered in monitoring the main control boards."*

*Contrary to the above, on January 7, 1996, operators did not notify the control room supervisor and shift supervisor of a mispositioned control rod, an unexpected situation encountered in monitoring the main control boards, until approximately 20 minutes after discovery.*

Admission or Denial to Violation A.

The District admits the violation.

Reason for Violation A.

Gross Misconduct. Both operators separately made a conscious decision to proceed with selection and movement of rods without informing supervision of the unexpected situation encountered.

Corrective Steps Taken and the Results Achieved - Violation A.

A Periodic Core Performance Log was performed to verify that no thermal limits had been exceeded.

Once made aware, the Shift Supervisor immediately informed plant management of the event. The Shift Supervisor and members of plant management observed crew performance to assure themselves that the crew was able to safely continue with reactor operations.

On January 8, 1996, line management took action to remove the crew from further active control room watch standing duty pending completion of its assessment and evaluation of the event. The crew was not reassigned to active Control Room watch standing status until crew dynamics and performance issues had been addressed as confirmed by observation in the simulator.

The Vice President Nuclear initiated an independent review team to investigate the reactivity mismanagement event.

Disciplinary action was taken against both operators. A site stand-down was held to address this issue and the necessity to report errors with all personnel on January 16, 1996.

Corrective Steps to Avoid Further Violations - Violation A.

No further corrective actions are required.

Date When Full Compliance Will Be Achieved - Violation A.

The District is in full compliance with 10 CFR 50, Appendix B, Criterion V.

Violation B.

*10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires in part, that, "Activities affecting quality shall be... accomplished in accordance with these instructions, procedures, and drawings."*

*Step 8.1.5 of Cooper Nuclear Station Operations Manual, Nuclear Performance Procedure 10.13, "Control Rod Sequence and Movement Control," Revision 26, dated December 24, 1995, requires that operators, "...not deviate from the sequence unless approved by a reactor engineer (or shift supervisor in an emergency) or per a SORC approved procedure."*

*Contrary to the above, on January 7, 1996, operators deviated from the approved sequence when operators inserted control rods starting with the incorrect page of the control rod sequence book without the express permission of a reactor engineer or the shift supervisor, or a SORC approved procedure.*

Admission or Denial to Violation B.

The District admits the violation.

Reason for Violation B.

This procedural violation resulted from personnel error. The Reactor Operator responsible for movement of the control rods did not verify he was on the right page of the sequence book prior to selecting the first rod to be moved.

Corrective Steps Taken and the Results Achieved - Violation B.

Written management expectations of the roles and responsibilities of the Reactor Operator and Second Checker during control rod manipulations was promulgated by the Operations Supervisor and Operations Manager.

Operations management further reviewed the areas where second checking and concurrent verification are used (including Procedure 10.13) to ensure their expectations are being met. While current procedures were found to be adequate, Operations Instruction #7 was revised to provide additional information regarding concurrent verification.

Corrective Steps to Avoid Further Violations - Violation B.

No further corrective actions are required.

Date When Full Compliance Will Be Achieved - Violation B.

The District is in full compliance with 10 CFR 50, Appendix B, Criterion V.

Violation C.

*10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that, "Activities affecting quality shall be...accomplished in accordance with these instructions, procedures, and drawings."*

*"Step 8.4.4 of Cooper Nuclear Station Operations Manual, Nuclear Performance Procedure 10.13, "Control Rod Sequence and Movement Control," Revision 26, dated December 24, 1995, requires that operators, "With concurrence of the shift supervisor and reactor engineering, implement a recovery plan...." when recovering from mispositioned control rods.*

*Contrary to the above, on January 7, 1996, operators failed to properly implement this procedure when the control room operators took actions to recover from mispositioned control rods using their own judgement rather than a recovery plan which had been concurred in by the shift supervisor and the reactor engineer.*

Admission or Denial to Violation C.

The District admits the violation.

Reason for Violation C.

Gross misconduct. Both operators separately made a conscious decision to proceed with selection and movement of rods without the concurrence or notification of the shift supervisor and reactor engineer.

Corrective Steps Taken and the Results Achieved - Violation C.

As discussed in response to Violation A, disciplinary actions were taken against the involved operators. Procedure 10.13 was reviewed and the requirements for compliance were discussed with operations personnel to ensure a common understanding of the procedure.

Corrective Steps to Avoid Further Violations - Violation C.

No further corrective actions are required.

Date When Full Compliance Will Be Achieved - Violation C.

The District is in full compliance with 10 CFR 50, Appendix B, Criterion V.

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.

[illegible]