



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS960206
November 6, 1996

Director, Office of Enforcement
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Reply to a Notice of Violation;
NRC Inspection Report No. 50-298/96-19;
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: Letter from Mr. J. E. Dyer (USNRC) to Mr. G. R. Horn (NPPD), dated
October 7, 1996, NRC Inspection Report 50-298/96-19 and Notice of
Violation.

This letter, including Attachment 1, constitutes Nebraska Public Power District's (the District) reply to the referenced Notice of Violation in accordance with 10 CFR 2.201. Inspection Report 50-298/96-19 documented the results of an NRC routine inspection conducted from July 28 through September 7, 1996, of aspects of Cooper Nuclear Station (CNS) operations, engineering, modifications and testing, maintenance, plant support, and Updated Safety Analysis Report. The District admits the violations and has completed all corrective actions that are necessary to return Cooper Nuclear Station (CNS) to full compliance with regard to 10CFR50 Appendix B, Criterion V.

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

Sincerely,

M. F. Peckham
Plant Manager

Attachment

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PDR ADOCK 05000298
Q PDR

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC - Cooper Nuclear Station

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REPLY TO OCTOBER 7, 1996, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from July 28 through September 7, 1996, two violations of NRC requirements were identified. The particular violations and the District's reply are set forth below:

"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 0.5, "Problem Identification and Resolution," Revision 8, Step 4.4.3, states, in part, that an operability assessment is required for conditions which could affect the operability or design of licensing basis structures, systems, and components. Procedure 7.3.16, "Low Voltage Relay Removal and Installation," Revision 8, Step 6.1, requires, in part, that interaction with other systems or equipment be fully researched prior to installing jumpers, lifting leads, or removing a relay.

"Contrary to the above, on September 6, 1996, Maintenance Work Order 96-1398 installed jumpers and replaced a relay affecting the operability of the essential second level undervoltage protection circuit for Vital Bus F relay dc power. An operability assessment was not performed for the use of an unqualified relay, and the interaction of the installed jumpers with other systems was not researched prior to installing the jumpers. These conditions affected the operability of the essential second level undervoltage protection circuit of Vital Bus F relay dc power."

Admission or Denial to Violation

The District admits the violation.

Reasons for Violation

This violation consists of two parts. The first part is the installation of a non-qualified relay in a safety-related application pursuant to a maintenance activity. An operability assessment was not performed to support its functionality relative to affected safety functions. The circumstances of this part are described in Section 04.1.b of the referenced Inspection Report. The second part concerns the failure to assess system interactions on Operability when temporary jumpers were installed during this same maintenance activity. The circumstances of this part are described in Section M1.2.b of the Inspection Report.

Part 1- This part of the Violation occurred because Plant Engineering personnel did not adequately review the full functionality of the non-conforming relay and its effects on auxiliary circuit operability prior to initiating the relay replacement activity. Station Procedure 1.8, "Warehouse Issue, Return and Shipping", Revision 18, allows the issuance of parts which have non-conforming conditions for installation in Essential applications, provided there is appropriate Engineering and Management concurrence. Although not an explicit

procedural requirement, this type of issuance has historically been performed when the end use application has been verified to be out-of-service. That this verification was not properly performed is due in large part to the lack of procedural prescriptiveness in what the proper review scope should be, and required documentation as to its accomplishment. Because the relay auxiliary functions were not recognized, the Shift Supervisor presumed that the existing Technical Specification (TS) Limiting Condition for Operation (LCO) 3.9.B.1.a for Emergency Transformer inoperability was properly encompassing, and he did not request a formal Operability Assessment (OA). An OA was later performed which corroborated the Shift Supervisor's judgment that equipment Operability was not adversely affected by the relay non-conformance.

Part 2- The reason for this part of the Violation is that Management's expectations for proper assessment of this temporary jumper installation was not adequately proceduralized. The wording in Limitation 6.1 of Procedure 7.3.16 could be understood to mandate a circuit review to ensure maintenance could be performed without causing an unplanned actuation or loss of function, rather than as a mechanism to resolve Operability questions. As noted in the Inspection Report, the jumpers were installed for about three hours.

Corrective Steps Taken and the Results Achieved

Part 1- The issuance of non-conforming parts for Essential applications is an infrequently performed activity. However, interim Management action has been taken to better control this process by ensuring that a review of the part's full contribution to system or component functionality is documented prior to issuance from the Warehouse.

Part 2- Procedure 7.3.16 has been changed to require a validation that the pending maintenance activity will not influence Operable equipment, otherwise the activity must be evaluated to justify its acceptability. This protocol has also been enhanced by requiring an independent second check of the conclusions reached.

Corrective Steps That Will Be Taken to Avoid Further Violations

Procedure 1.8 will be revised to require explicit documentation of the part's functionality review prior to issuance.

Date When Full Compliance Will Be Achieved

Based on the effectiveness of the corrective actions taken to date, the District is in full compliance with the requirements of 10 CFR 50 Appendix B, Criterion V with respect to this violation.

"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.

"Surveillance Procedure 6.HPCI.103, "HPCI IST and Quarterly Test Mode Surveillance Operation," Revision 2, Step 9.2, directs removal of the lanyard potentiometer from the stop valve.

"Contrary to the above:

"On August 27, 1996, following performance of Surveillance Procedure 6.HPCI.103, the licensee declared the high pressure core [sic] injection system operable without removing the lanyard potentiometer from the stop valve. The lanyard potentiometer was installed for 16 hours without an evaluation of the affect on operability.

"On August 29, 1996, Procedure 7.2.53.7, "Operation of Engine Analysis," Revision 0.2, was not appropriate to the circumstances in that no instructions were established to control installation of test equipment. The safety evaluation for Procedure 7.2.53.7 stated that test equipment should only be installed while the diesel generator is in an allowed outage time or is required to be operable. Diesel Generator 2 was returned to an operable status with test equipment installed."

Admission or Denial to Violation

The District admits the violation.

Reasons for Violation

The District has reviewed the circumstances described in Section M1.3 of Inspection Report 96-019 with regard to the first part of this Violation. The Shift Supervisor made a judgment that HPCI could be declared operable without removing the lanyard potentiometer due to the existing procedural controls that inappropriately allowed him to exit the HPCI Allowed Outage Time (AOT) without completing Step 9.2.

With regard to the second part of this Violation, the 10CFR50.59 applicability review that was performed for Procedure 7.2.53.7, Revision 0, states the following:

This procedure gathers data to be used in the assessment of EDG [Emergency Diesel Generator] condition for the purposes of predictive maintenance. While the data gathering is intrusive and has the potential for damage or negative performance impact, the EDG equipment is either performing per the surveillance, in an AOT [Allowed Outage Time], or not required by plant condition during the performance of this procedure.

While miscommunication was a factor in this event, Maintenance and Operations personnel qualitatively did not consider the physical attachment of the motion encoder assembly to be a part of the "data gathering activity" described above in that it was neither intrusive nor having the potential for EDG damage or negative performance impact. Nevertheless, it was inappropriate to have declared the EDG Operable without a prior Operability Assessment that discussed any changes to its current seismic qualification.

Corrective Steps Taken and the Results Achieved

An evaluation was performed for both of the above configurations which concluded that neither situation adversely affected component or system operability. Instruction has been provided to Operations personnel to heighten their sensitivity to test equipment installed on Technical Specification controlled systems and components. Procedure 7.2.53.7 has been changed to ensure the Control Room is aware of when the EDG testing equipment has been installed.

Corrective Steps That Will Be Taken to Avoid Further Violations

The CNS surveillance testing procedures are being reviewed in order to ensure the installation and removal of test equipment is performed consistently with Operability requirements.

Date When Full Compliance Will Be Achieved

Based on the Engineering dispositions of the specific Operability concerns raised by these two issues and the corrective actions taken to date, the District is in full compliance with the requirements of 10 CFR 50 Appendix B Criterion V with respect to this violation.

Correspondence No: NLS960206

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 1.8 will be revised to require explicit documentation of the part's functionality review prior to issuance.	None
The CNS surveillance testing procedures are being reviewed in order to ensure the installation and removal of test equipment is performed consistently with Operability requirements.	None