

ENCLOSURE 1

NOTICE OF VIOLATION

Nebraska Public Power District
Cooper Nuclear Station

Docket No.: 50-298
License No.: DPN-46

During an NRC inspection conducted on October 7 through February 19, 1997, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, on or about June 1995, potential conditions adverse to quality identified by a contractor's review of the licensee's design criteria documents were not identified as conditions adverse to quality until December 20, 1996. For example:

1. Technical Specification 3.9.A.1.b and the associated surveillance requirement for ensuring adequate supply of emergency diesel generator fuel did not ensure a sufficient fuel oil supply to meet the safety design basis specified in USAR Section VIII-5.2.7, "Standby AC Power Source, Safety Design Basis."
2. The sizing calculation for the automatic depressurization system accumulators included non-conservative assumptions that did not assure that the accumulators would support the safety function of the main steam relief valves.

This is a Severity Level IV violation (Supplement I) (50-298/9624-09)

- B. Technical Specification 6.3.2 requires, in part, that written procedures be established and implemented for emergency conditions involving possible releases of radioactive materials.

Contrary to the above:

1. As of November 1, 1996, Emergency Operating Procedure 5.8.8, "Alternate Boron Injection and Preparation," Revision 3, had been established for emergency conditions involving possible releases of radioactive materials. However, the procedure was inadequate because it failed to provide appropriate instructions to ensure that adequate space was available in the reactor vessel when the reactor core isolation cooling system was utilized for alternate boron injection.

2. As of November 1, 1996, Standard Operating Procedure 2.2.69.2, "RHR [residual heat removal] System Shutdown Operations," Revision 19, was being used for emergency conditions involving possible releases of radioactive materials. However, the procedure failed to provide appropriate instructions to ensure that design basis boron concentrations would not be compromised during an anticipated transient without scram event.
3. As of November 1, 1996, Standard Operating Procedure 2.2.69.2, "RHR [residual heat removal] System Shutdown Operations," was being used for emergency conditions involving possible releases of radioactive materials. However, the procedure failed to provide appropriate instructions to ensure that the containment of radioactive materials would not be compromised during an anticipated transient without scram event or a design basis accident.

This is a Severity Level IV violation (Supplement VIII) (50-298/9624-07)

- C. Technical Specification 5.3.1, "Introduction," requires that station personnel shall be provided detailed written procedures to be used for maintenance of system components and systems that could have an effect on nuclear safety.

Technical Specification 6.3.3 C., "Maintenance and Test Procedures," states that procedures will be provided for preventive or corrective maintenance of plant equipment and systems that could have an affect on nuclear safety.

Maintenance Procedure 7.2.55.2, "HCU SCRAM Valve Operator Diaphragm Replacement," Revision 2, requires that scram valve mounting assembly capscrews be torqued to 240 in-lbs.

Contrary to the above, licensee personnel did not fully use Maintenance Procedure 7.2.55.2, in that, on or about November 21, 1996, one capscrew on each of the mounting brackets for Inlet Scram Valve CRD-AO-CV126 and Outlet Scram Valve CRD-AO-CV127 on Hydraulic Control Unit 38-23 were not torqued to 240 in-lbs.

This is a Severity Level IV violation (Supplement I) (50-298/9624-06)

Pursuant to the provisions of 10 CFR 2.201, Nebraska Public Power District is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the

results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 25th day of February 1997