



Nebraska Public Power District

COOPER NUCLEAR STATION
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402)825-3811
FAX (402)825-5211

NLS970056

April 17, 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. 50-298/96-25
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from K. E. Brockman (USNRC) dated March 4, 1997, "NRC Inspection Report 50-298/96-25, Exercise of Enforcement Discretion and Notice of Violation"

By letter dated March 4, 1997, (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 Notices of Violation in accordance with 10 CFR 2.201. The District admits to the violations and has completed all corrective actions necessary to return Cooper Nuclear Station (CNS) to full compliance.

The referenced inspection report also noted that the District had verbally committed to complete the review of the remainder of outstanding maintenance work requests (MWRs) and to disposition identified unauthorized modifications. The District confirms this commitment to review the remainder of MWRs by December 31, 1997, and disposition identified unauthorized modifications by June 30, 1998.

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

Sincerely,

P. D. Graham
Vice President of Nuclear Energy

/nr

Attachment

230052



9704230241 970417
PDR ADOCK 05000298
G PDR

IEW 1/1

NLS970056
April 17, 1997
Page 2 of 2

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

REPLY TO MARCH 4, 1997, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted on November 18-22 and December 9-13, 1996, two violations of NRC requirements were identified. The particular violations and the District's reply are set forth below:

Violation

Technical Specification 6.2.1.A.4.e, requires a review of station operation by the Station Operations Review Committee so that potential nuclear safety hazards could be detected.

Contrary to the above, during the period of July 2 through November 25, 1996, the Station Operations Review Committee did not review station operations to detect potential nuclear safety hazards.

This is a Severity Level IV violation (Supplement 1) (50-298/9625-01).

Admission or Denial to Violation

The District admits the violation.

Reason for Violation

This violation is attributed to poorly defined procedural requirements. Station Procedure 0.3, Station Operations Review Committee (SORC), did not clearly define station operations review requirements, creating the potential for an operational or safety hazard issue to be missed. While SORC reviewed potential nuclear safety hazards in their review of procedure changes, design modifications, safety evaluations; etc., this aspect of their review was not specifically documented in SORC meeting minutes.

Corrective Steps Taken and the Results Achieved

As of December 1996, the review of plant operational issues to detect potential nuclear safety hazards has been identified in the SORC meetings/minutes as a separate presentation category. The Plant Operations Manager periodically presents to SORC current plant operational issues and safety concerns which could potentially affect the continued safe operation of the station. Items are presented for review and awareness as to the individual and cumulative effects of safety and operations implications. In addition, effective in March 1997, at the beginning of each SORC meeting, the membership is asked if they have any immediate safety concerns with plant operations/conditions or the material being presented. In order to ensure continued compliance with the Technical Specification requirement to review station operation to detect potential nuclear safety hazards, Procedure 0.3, "Station Operations Review Committee," was revised to add appropriate

clarification. A procedure revision was approved on March 20, 1997, which clarifies that SORC review to meet the subject Technical Specification requirement will include a standard opening review for any immediate operational safety concerns or any safety concern with the material being presented to SORC for review, as well as a routine advisement by Operations regarding current plant operational issues.

A review was performed to determine if SORC was properly implementing other Technical Specification review requirements. This review concluded that other specific areas of SORC responsibility delineated in the Technical Specifications are being appropriately implemented.

Corrective Steps That Will Be Taken to Avoid Further Violations

No additional actions beyond those discussed above are required.

Date When Full Compliance Will Be Achieved

The District is currently in full compliance.

Violation

10 CFR Part 50, Appendix B, Criterion XVI, requires, in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall ensure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, on November 20, 1996, one of the corrective actions for Quality Assurance Audit 96-08, which included revising Procedure 0.7.1, "Control of Combustibles," personnel training on this revision, and interim plant walkdowns to identify and correct transient combustible control problems, was inadequate. Specifically, the plant walkdowns failed to identify and correct three transient combustible control problems.

This is a Severity Level IV violation (Supplement 1) (50-298/9625-07).

Admission or Denial to Violation

The District admits the violation as further clarified below.

Reason for Violation

The District believes actions taken in response to the Significant Condition Adverse the Quality (SCAQ) were effective in precluding recurrence. The scope of the SCAQ was to address the concerns of Quality Assurance (QA) Audit 96-08 identified a number of examples where transient combustible materials were located in areas containing safety related equipment. Specifically, the audit finding stated:

"Procedure 0.7.1 [Control of Combustibles] does not effectively control combustibles and presents significant vulnerabilities for exceeding the heat loading of fire zones as analyzed in the Fire Hazards Analysis [FHA]."

"It has been concluded that the listings of combustible loadings for Fire zones may potentially have fire loadings greater than the total loading allowed in the FHA without additional compensatory actions (e.g., fire watch)."

In follow up to the QA audit, SCAQ 96-0516 was initiated and immediate corrective actions were taken to:

- Assess impact to the FHA. This assessment demonstrated that the FHA assumptions had not been violated.
- Restore compliance with Procedure 0.7.1. This was done by removing or issuing Transient Combustible Permits for the identified combustibles.
- Initiate weekly plant walk downs by Fire Protection personnel to check for compliance with Section 8.2 of Procedure 0.7.1 (i.e., significant accumulations of transient combustibles that had the potential to violate FHA assumptions).

In addition, actions were taken to heighten the staff's awareness via memorandum and various news letters. These actions have been adequate to preclude repetition of the originally identified condition. However, the District acknowledges that housekeeping concerns involving quantities of transient combustibles significantly less than FHA assumptions (typified by the examples discussed in this violation) still remain. These remaining concerns are a result of:

- Programmatic weaknesses in the fire protection program. The purpose of Procedure 0.7.1, "Control of Combustibles," is to control transient combustibles such that the fire loading assumptions of the FHA are not violated. While the procedure includes some housekeeping expectations, it relies on other programs and procedures to control transient combustibles of minimal significance (i.e., quantities more accurately described as housekeeping issues), there is no recognition of this fact nor are there formalized ties to these programs and procedures.
- Weaknesses in the implementation of the housekeeping program. Directive 11, "Site Housekeeping and Inspection Program," was significantly revised in April 1995 and, while

achieving improved overall housekeeping practices, has yet to be assessed for effectiveness in meeting management's expectations. The housekeeping program was further enhanced in June 1996 with the issuance of Procedure 0.44, "Housekeeping Cleanliness Controls." Although this procedure provided better integration with other station procedures, it has introduced an element of program fragmentation.

Corrective Steps Taken and the Results Achieved

As noted above, an initial assessment of operability verified that the fire loading assumptions of the FHA have not been challenged. Further, the specific examples identified by this violation were resolved. The weekly plant walk downs by Fire Protection personnel are continuing. These walk downs will continue until the corrective actions relative to Procedure 0.7.1 described below are completed.

Corrective Steps That Will Be Taken to Avoid Further Violations

1. Procedure 0.7.1 will be revised to address the programmatic weaknesses described above. Further, performance indicator(s) for transient combustible material control will be developed and reported to station management. This will provide a means of communicating the results of performance monitoring, thereby providing a basis for consistent reinforcement of transient combustible material control standards.
2. A self assessment of the housekeeping program and implementing procedures will be performed to ensure program results are meeting management expectations.

Date When Full Compliance Will Be Achieved

The District is in full compliance, as clarified above, with respect to the cited violation. Procedure 0.7.1 will be revised to address the programmatic weaknesses described above by July 31, 1997.

ATTACHMENT 3 LIST OF NRC COMMITMENTS

Correspondence No: NLS970056

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]