



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS970077
April 29, 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. 50-298/97-02
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from T. P. Gwynn (USNRC) dated March 31, 1997, "NRC Inspection Report 50-298/97-02 and Notice of Violation"

By letter dated March 31, 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 Notice of Violation 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,

P. D. Graham
Vice President of Nuclear Energy

/nr
Attachment

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution
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Powerful Pride in Nebraska

REPLY TO MARCH 31, 1997, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from January 12, through February 22, 1997, two violations of NRC requirements were identified. The particular violations and the District's reply are set forth below:

Violation

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above on February 4, 1997, the inspectors determined that Procedure 7.3.1.6, "125/250v Station Battery Charger Protective Relays Testing and Calibration," Revision 7, was not properly implemented. In particular: (1) Section 4 of Procedure 7.3.1.6 contained a note requiring the performance of an action, which was not performed until addressed by the inspector after completion of subsequent steps; (2) Section 4 did not contain instructions on the method to determine the as found condition of a relay if it was outside its calibration range, which caused technicians to perform actions not stated in the procedure; and (3) the procedure incorrectly stated the test position of a relay contact and the technicians failed to recognize this during at least three performances of this procedure.

Admission or Denial to Violation

The District admits the violation.

Reason for Violation

On February 4, 1997, MWR 97-0168 was performed for replacement of a battery charger relay. The MWR instructions required the as-found values for the old relay be determined using Procedure 7.3.1.6, "125/250 VDC Station Battery Charger Protective Relays Testing and Calibration," Revision 7. Procedure 7.3.1.6 was not appropriate to the circumstances in that three problems were noted during performance of this procedure:

- 1) A note preceding step 4.1 required an action to be performed. The actions that satisfy the instructions in steps 4.1 and 4.2 were performed during the installation of the battery charger relay and were therefore, not performed during the testing being performed in section 4 of procedure 7.3.6.1. However, following review, it was determined that the procedure was inconsistent with the Procedure Writer's Guide (PWG). Per the PWG, notes are to provide information only. The subject note in Procedure 7.3.1.6 contained instructional steps.

- 2) Step 4.7 required that the voltage be increased until the relay closed. Since the relay was already closed, to determine the as-found condition, the electrician decreased the voltage until the relay opened then increased the voltage until the relay closed. While these actions determined the as-found condition, the procedure did not contain any steps specifying the actions the electrician performed.
- 3) Step 4.15 required decreasing voltage until the relay contact opens, instead of until the relay contact closes which was in error. While the error was corrected prior to completion of the procedure, the procedure had been previously completed without the error being corrected, contrary to management expectations that errors be corrected prior to continuing. Note that this scenario is incorrectly characterized in Inspection Report 97-02 (Section M3.1(b), page 8) in that it implies the relay is initially open.

The reason for this violation is that management failed to establish and reinforce a rigorous approach to procedure adherence within the Maintenance Department resulting in a culture that has used "skill of the craft" as a work around for procedural deficiencies.

Corrective Steps Taken and the Results Achieved

Procedure 7.3.1.6 was revised to address the deficiencies noted above.

Additionally, a CNS site standown for procedural use and adherence was held in March 1997. The issue of procedural adherence was given a top management priority, becoming one of the principal CNS alignment issues. To address the continuing procedural adherence problems at Cooper, several actions were taken which included:

- a focus group was established to address the magnitude of problem and establish a plan to address procedural adherence,
- a talking point paper for managers, supervisors, and leads was developed and presented to station managers, supervisors and lead personnel,
- a site-wide procedure adherence pre-test was administered to establish a baseline and determine where improvements needed to be made,
- site personnel were provided with training sessions on procedural adherence, and;
- personnel were then re-examined and those not passing the test by receiving a score of 100% were immediately remediated before returning to work.

Maintenance management continues to monitor and reinforce Maintenance procedural compliance and in addition to the corrective actions discussed in response to the second violation, management expectations for maintaining a questioning attitude regarding procedural inadequacies and noncompliance has been disseminated to Maintenance Department personnel.

Corrective Steps That Will Be Taken to Avoid Further Violations

Performance in this area will be monitored through the performance indicators also established in the response to the second violation.

Date When Full Compliance Will Be Achieved

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

Violation

Criterion XVI of Appendix B to 10 CFR Part 50 requires 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 assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Procedure 0.5, "Problem Identification and Resolution," Revision 8, Step 14, 13.1, requires that any individual aware of a problem that is or potentially could be a condition adverse to quality is responsible for initiating a problem identification report. Step 1 states, in part, that this procedure provides instructions for identification of problems and includes significant conditions adverse to quality as defined in 10 CFR Part 50, Appendix B.

Contrary to the above, on February 6, 1997, the inspectors determined that the licensee failed to enter into the problem identification report process three examples of a failure to properly implement Procedure 7.3.1.6.

Admission or Denial to Violation

The District admits the violation.

Reason for Violation

The discussion in response to the first violation identified examples of procedural deficiencies which should have been immediately documented in the CNS Corrective Action Program (CAP) through the use of Procedure 0.5, "Problem Identification and Resolution," when identified by the electricians. This is a failure to provide clear expectations for when a PIR is to be initiated. At the time of this violation, there was a common misunderstanding within the Maintenance Department as to what discrepancies require initiation of a Discrepancy Resolution Sheet versus a Problem Identification Report (PIR). Although CNS Procedure 7.0.4, "Conduct of Maintenance," provided instructions for the use of Discrepancy Sheets, including documentation requirements when PIRs are warranted, Procedure 7.0.4 did not explicitly restate the general requirements of Procedure 0.5.

Corrective Steps Taken and the Results Achieved

- 1) Procedure 7.0.4 was clarified to require all problems that could be adverse to quality to be addressed by a PIR.
- 2) The Maintenance Manager has articulated and clarified his expectations for PIR initiation to all Maintenance personnel. This expectation has also been applied to historical issues that should have resulted in generation of a PIR.
- 3) A more consistent set of criteria was established and provided to maintenance personnel.

Performance indicator(s) have been developed to monitor compliance with Procedures 7.0.4 and 0.5 and, as discussed in the response to the first violation, for procedural inadequacies. Preliminary results of these corrective actions show a prompt improvement in maintenance self-identification of conditions adverse to quality through the use of PIRs, but lack sufficient data to indicate a long-term trend.

Corrective Steps That Will Be Taken to Avoid Further Violations

Maintenance management will continue to monitor compliance with Procedures 7.0.4 and 0.5 through the use of performance indicator(s) based on procedural adherence and procedural inadequacies. It is anticipated that adequate data to indicate trends in these areas will be available by July 1, 1997.

Date When Full Compliance Will Be Achieved

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

