



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS970092

May 2, 1997

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

Subject: Revised Reply to a Notice of Violation
NRC Inspection Report No. 50-298/96-26
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from J. E. Dyer (USNRC) dated December 26, 1996, "NRC Inspection Report 50-298/96-26 and Notice of Violation"

2. Letter to USNRC from P. D. Graham (NPPD) dated January 27, 1997, "Reply to a Notice of Violation, NRC Inspection Report No. 50-298/96-26, Cooper Nuclear Station, NRC Docket 50-298, DPR-46"

By letter dated December 26, 1996 (Reference 1), the NRC cited Nebraska Public Power District (District) as being in violation of NRC requirements. The District's reply to the referenced Notice of Violation was provided by letter dated January 27, 1997 (Reference 2). Subsequent to the January 27, 1997, response, the District took additional actions to bound the condition cited in the original Notice of Violation. This letter, including Attachment 1, revises the District's previous response to inform the NRC of these actions and results achieved.

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

Sincerely,

P. D. Graham
Vice President - Nuclear

/crm

Attachment

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May 2, 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 DECEMBER 26, 1996, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46
(REVISED)

During NRC inspection activities conducted on October 20 through November 30, 1996, one violation of NRC requirements was identified. The particular violation and the District's reply are set forth below:

Violation

"Technical Specification 4.5.F.1.c states, in part, when it is determined that one diesel generator is inoperable, to determine within 24 hours that the operable diesel generator is not inoperable due to common cause failure or perform Technical Specification Surveillance Requirement 4.9.A.2.a.1.

On October 21, 1996, Diesel Generator 2 was declared inoperable due to a fuel oil leak on the supply line to Injector 7L.

On October 23, 1996, during the postmaintenance test on Diesel Generator 2, the motor-operated potentiometer failed, causing the diesel to drop load.

Contrary to the above, for the two above failures, the licensee did not determine within 24 hours that the operable diesel generator was not inoperable due to common cause failure and did not perform Technical Specification Surveillance Requirement 4.9.A.2.a.1 (to run the operable diesel generator) within 24 hours."

Admission or Denial to Violation

The District admits the violation.

Reason for Violation

The surveillance requirement of Technical Specification 4.5.F.1.c was implemented in Amendment 175 to the CNS operating license on April 29, 1996. Administrative controls for documenting the required common cause failure analysis were not developed. This violation resulted from the failure of management to adequately communicate expectations through the development or initiation of administrative controls for the staff to implement the Technical Specification 4.5.F.1.c surveillance requirement regarding documentation of a common mode failure analysis.

Corrective Steps Taken and the Results Achieved

In both examples, Operations personnel were aware of the Technical Specification surveillance requirement. Common mode failure analyses that determined Diesel Generator 1 was operable were performed but not documented. Common mode failure evaluations were subsequently documented for both occurrences of Diesel Generator 2 inoperability. Both evaluations indicated Diesel Generator 1 was not inoperable due to a common cause.

Other occurrences of diesel generator inoperability since the Technical Specification surveillance requirement was implemented were reviewed for other examples of undocumented common cause failure analyses. No other examples were found.

Operations Management discussed this violation with all Shift Supervisors and Shift Technical Engineers to communicate expectations regarding review and documentation of Technical Specification requirements.

Additionally, the Tech Spec Tracker and corrective action programs have been revised to prompt personnel to perform and document the common cause failure analysis required when a Diesel Generator becomes inoperable.

To bound this condition, amendments received after Amendment 165 were reviewed to ensure that implementing actions had been appropriately taken. No additional discrepancies were identified. (One provision of Amendment 175 providing for an optional "slow start" test of the diesel generators was purposefully not immediately implemented to allow for maintenance and testing necessary to support its implementation. These actions have subsequently been completed and surveillance test procedures revised to support this option.) Amendments received prior to Amendment 166 had been previously reviewed during the 1994 - 1995 time frame as part of the Surveillance Test Validation Program (STVP).

Corrective Steps That Will Be Taken to Avoid Further Violations

None.

Date When Full Compliance Will Be Achieved

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

Correspondence No: NLS970092

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]