



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS970119
June 11, 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. 50-298/97-03
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from T. P. Gwynn (USNRC) dated May 16, 1997, "NRC Inspection Report 50-298/97-03 and Notice of Violation"

By letter dated May 16, 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 violation 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

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PDR ADOCK 05000298
G PDR

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC



170136 NPG Distribution

Powerful Pride in Nebraska

REPLY TO MAY 16, 1997, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from February 23, 1997, through April 5, 1997, one violation of NRC requirements was identified. The particular violation and the District's reply are set forth below:

Violation

Technical Specification 6.3.2, states, in part, written procedures and instructions shall be established, implemented, and maintained for the fire protection program.

Procedure 0.39, "Fire Watches," Revision 12, Step 8.4.1, states in part, that all fire watch personnel shall be diligent in their observance of the affected area and alert for signs of fire and smoke. Fire watch personnel shall maintain continuous observation of the affected area.

Procedure 0.39, Step 8.1.4, states, in part, that immediately prior to the start of the hot work, the fire watch shall ensure combustible material shall be protected from hot work. Protection is required for a radius of 35 feet from the hot work.

Contrary to the above, on March 6, 1997, during installation of Modification 94-072, fire watch personnel did not maintain continuous observation of the affected area in that sparks from welding and grinding extended beyond the range of the view of the camera used for fire watch observation. Also, fire watch personnel did not ensure that combustible material, which was located within 35 feet of hot work in progress, was protected.

Admission or Denial to Violation

The District admits the violation.

Reason for Violation

Interviews conducted with the fire watches associated with this work indicated that Procedure 0.39, "Fire Watches," contained the appropriate requirements with respect to control and protection of combustible material in the vicinity of hotwork; however, strict compliance with the procedure was not enforced by supervision. The fire watches' tolerance of an inadequate field of view was also evidence of procedure adherence problems. A contributing cause to these procedural adherence problems was that a weakness existed in the procedure in that it did not provide specific guidance on the use of cameras and the authority to stop work if conditions were not in accordance with procedure requirements.

Corrective Steps Taken and the Results Achieved

Immediate corrective actions taken included:

- The conditions in the room were corrected by removing or protecting combustible materials and the addition of a third camera to increase the field of view.
- A site-wide moratorium on hotwork was implemented until briefings with fire protection personnel could be held for each job and work group to outline expectations for fire watch performance and to emphasize fire watch stop work authority if fire safe conditions do not exist.
- A site wide stand down on work for procedure adherence was held the following day. Included in this stand down was training and testing to procedure adherence expectations and requirements.
- Procedure 0.39 was revised to clearly delineate the requirements for control and protection of combustible material in the vicinity of hotwork to aid procedural adherence.

As a result of these actions, no hotwork related fires occurred during the recently completed refueling outage. In addition, the following actions have been taken:

- Ongoing corrective actions to address the site wide issue of procedural adherence have been made a station alignment issue and incorporated into the business plan.
- Administrative Procedure 0.39 was revised to specify the conditions under which and how cameras may be utilized for fire watch activities and to include a discussion on fire watch authority in addition to responsibilities.

Corrective Steps That Will Be Taken to Avoid Further Violations

No further corrective actions beyond those discussed above are required.

Date When Full Compliance Will Be Achieved

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

Correspondence No: NLS970119

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]