

ENCLOSURE 1

Nebraska Public Power District  
Cooper Nuclear Station  
Docket No. 50-298

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during August 15-18, 1978, it appears that certain of your activities were not conducted in full compliance with NRC requirements as indicated below:

- A. Technical Specification 6.2.B.4 specifies the activities that must be reviewed by the Safety Review and Audit Board.

Contrary to this requirement the following activities delineated in this specification, were not reviewed by the Safety Review and Audit Board.

1. Minutes of SORC meeting numbers 141 and 142.
2. Cooper Nuclear Station Security Plan and revised Emergency Plan.
3. The safety evaluations for minor design changes to essential systems accomplished under the provisions of 10 CFR 50.59.
4. The licensee's responses to NRC Notices of Violation.

This is an infraction.

- B. Criterion V to 10 CFR 50, Appendix B, requires in part that activities affecting quality be prescribed by written approved procedures and that these activities be accomplished in accordance with these procedures. This requirement is amplified in the licensee's Quality Assurance Manual, Section 2.5.

Contrary to this requirement, the following licensee procedures were not adhered to for the review and handling of completed design change packages for safety related systems.

1. The completed design change packages were not reviewed by the QA Department as required by QAP-1700, "Quality Assurance Plan - Design Changes (major and minor)."
2. The Engineering Department's "active file" of completed design changes contained completed packages back to 1975. QAI-7, "Quality Assurance Records - Retention, Storage and Disposition," permits the "active file" to retain completed design changes for one year at which time they are to be forwarded to the document control center for storage.

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3. Completed design change records packages did not contain a copy of the "as accomplished" design change procedure. Section 2.6 of the Quality Assurance Manual requires a redundant record file at the Corporate office.

This is an infraction.

- C. Criterion XVII of Appendix B to 10 CFR 50 requires in part, "Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted . . . ." This criterion is amplified in Section 2.17 and Section 4.1.1 of the licensee's Quality Assurance Program.

Contrary to this requirement, the type of observation and the results achieved were not recorded for seven safety related maintenance activities for which the licensee specified that a quality control inspection was required.

This is an infraction.

- D. Technical Specification 4.2.D requires a functional test of the mechanical vacuum pump isolation logic once per operating cycle. This specification is satisfied by the performance of the licensee's Surveillance Procedure 6.2.7.1, "Mechanical Vacuum Pump Isolation Logic - Functional Test."

During the performance of Surveillance Procedure 6.2.7.1 on April 15, 1978, valves AR-153AV and AR-154AV failed close when a test signal was inserted. Following repair of the air operators for these valves, the valves were exercised by operating the control room control switch. This control switch is in parallel with the isolation logic. The appropriate parts of Surveillance Procedure 6.2.7.1 were not rerun to verify that the isolation signal from the logic would cause the valves to shut. This is contrary to Technical Specification 4.2.D.

This is an infraction.