



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

JUN 26 1997

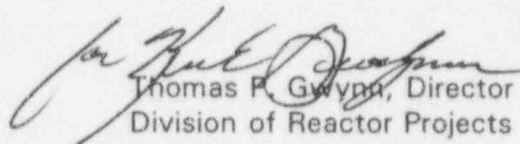
G. R. Horn, Senior Vice President  
of Energy Supply  
Nebraska Public Power District  
1414 15th Street  
Columbus, Nebraska 68601

SUBJECT: NRC INSPECTION REPORT 50-298/97-03

Dear Mr. Horn:

Thank you for your letter of June 11, 1997, in response to our letter and Notice of Violation dated May 16, 1997, involving an inadequate fire watch observation of hot work and a lack of protection for combustible material during hot work. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

  
Thomas P. Gwynn, Director  
Division of Reactor Projects

Docket No.: 50-298  
License No.: DPR-46

cc:

John R. McPhail, General Counsel  
Nebraska Public Power District  
P.O. Box 499  
Columbus, Nebraska 68602-0499

P. D. Graham, Vice President of  
Nuclear Energy  
Nebraska Public Power District  
P.O. Box 98  
Brownville, Nebraska 68321

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Q PDR



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Kansas Radiation Control Program Director

JUN 26 1997

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator

DRP Director

Branch Chief (DRP/C)

Branch Chief (DRP/TSS)

Project Engineer (DRP/C)

Resident Inspector

DRS-PSB

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JUN 26 1997

bcc to DCD (IE01)

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Regional Administrator

DRP Director

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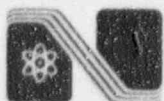
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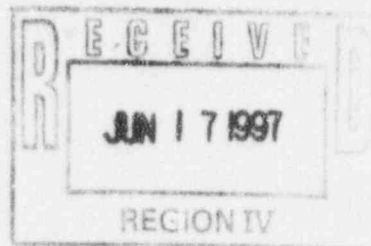
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## Nebraska Public Power District

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

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

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

NPG Distribution

97-1315

97-06180457-461

**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]