



Nebraska Public Power District

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NLS8800177
April 5, 1988

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: NPPD Response to Inspection Report 50-298/88-02

Gentlemen:

This letter is written in response to your letter dated February 24, 1988, which transmitted Inspection Report No. 50-298/88-02. Therein you identified two violations in the District's emergency preparedness program and cited one notice of deviation from commitment.

Following are the statements of the violations and the deviation and our responses thereto in accordance with 10 CFR 2.201:

A. STATEMENT OF VIOLATION

Failure to Perform Training

10 CFR 50.54(q) requires that a licensee shall follow and maintain in effect emergency plans which meets the standards in 50.47(b) and the requirements in Appendix E.

Section 8.1.1 of the Cooper Nuclear Station (CNS) Emergency Plan states that formal classroom training is provided to each CNS employee on an annual basis. Additionally, the Plan states that initial training will be conducted and refresher training will be conducted on an annual basis. The Plan listed 11 functional categories that required initial training and retraining. Among those requiring training and retraining were Station Operators/Operational Support Center (OSC) personnel. The Emergency Plan Training Program is charged with ensuring that station personnel who will be active participants in the emergency organization are familiar with the contents of the Emergency Plan and Emergency Plan Implementing Procedures (EPIPs).

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Contrary to the above, a review of randomly selected emergency response personnel training records indicated that nine individuals had not received the appropriate required emergency response training, in that eight Station Operators had not received required annual formal classroom retraining during calendar year 1987 and one Station Operator had not received the required initial training or retraining.

This is a Severity Level IV violation. (Supplement VII) (298/8802-01)

This is a repeat violation (298/8702-02).

REASON FOR VIOLATION

Through personnel error an entire class of emergency response personnel, station operators, was inadvertently omitted from the EP training schedule for 1987.

The prepared schedule was not verified against the requirements of the Emergency Plan.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The NPPD Nuclear Training Department immediately conducted a record search regarding the finding. One Station Operator was confirmed not to have participated in classroom training, however, the individual had participated in a drill. Classroom training was provided to this individual prior to his resuming his duties.

In reviewing the records of the other eight Station Operators it was noted that these individuals received annual EP training during November - December 1986. Normal training requalification for annual courses is defined as 12 months + 25% or approximately 64 weeks. The individuals in question were 50-60 weeks into this cycle. Three of the eight remaining individuals had received classroom instruction during 1987, but their end-of-training test did not contain an Emergency Preparedness section/examination question. Classroom training for these three individuals and the remaining five was conducted and successfully completed between January 12, 1988 and January 18, 1988.

Subsequent review of the training records performed, concurrent with the development of an EP training matrix, identified one (1) Health Physics and five (5) Maintenance OSC personnel who also had not received the applicable training. These individuals were immediately removed from their emergency response duties. These employees are scheduled to be trained in May 1988.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO PREVENT FURTHER VIOLATIONS

A matrix is being developed to correlate the emergency response personnel with the appropriate course(s). This matrix along with the Training Management System (TMS) will facilitate tracking the training for the emergency response organization personnel. The TMS is designed to provide information on the current training status of each member of the emergency response organization. The Nuclear Training Department will maintain the records.

The Emergency Preparedness Department will ensure each position in the emergency response organization is properly staffed, and that all appropriate emergency response personnel are adequately trained. To ensure that emergency response personnel are adequately trained, the Emergency Preparedness Department will monitor the TMS to ensure emergency response organization personnel receive the required training.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The emergency response organization is currently in full compliance with the training requirements as described in the Nebraska Public Power District Emergency Plan and also with the requirements as set forth in 10 CFR 50 Appendix E, part F.

B. STATEMENT OF VIOLATIONFailure to Make Available Evaluation Review

10 CFR 50.54(t) requires that part of the review, involving evaluation for adequacy of license interface with state and local governments, shall be made available to the appropriate state and local governments. Section 8.3 of the Plan states, "Audits ... includes Quality Assurance audits per 10 CFR 50.54(t) and NRC Inspection Report response submittal". A QA evaluation/audit was conducted during March, April, and May 1987. The evaluation audit report transmittal memo stated, "As specifically pointed out in previous Emergency Preparedness evaluation/audits reports, it is the responsibility of the Emergency Planning Coordinator to ensure dissemination of the results of the attached report regarding interfaces to contiguous state and local authorities in compliance with 10 CFR 50.54(t)".

Contrary to the above, the licensee could not produce records indicating that the state or local government had been notified of the evaluation/audit report.

This is a Severity Level IV violation. (Supplement VIII) (298/8802-02)

REASON FOR VIOLATION

The action to disseminate the report to the appropriate state organizations was unintentionally omitted from the EP Action Tracking system and therefore was not accomplished. Reorganizational changes in the District's Emergency Preparedness organization during 1987 contributed to this omission.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

The applicable portions of the 1987 10 CFR 50.54(t) audit independent assessment conducted by Quality Assurance were sent to the appropriate state governmental agencies on January 11, 1988.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO PREVENT FURTHER VIOLATIONS

The responsibility for this activity is clearly delineated in the Emergency Plan. This is now one of the regularly scheduled activities tracked by the Emergency Preparedness Supervisor, and has been added to the EP Action Tracking System. To ensure that this item is tracked to its completion it will also be tracked by the Licensing Department on their Action Item Tracking System.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The District is currently in full compliance with this requirement.

C. NOTICE OF DEVIATIONFailure to Test Mobile Sirens

In a response to Confirmatory Action Letter dated March 12, 1982, from J. T. Collins, Regional Administrator, NRC Region IV to J. M. Pilant, Division Manager of Licensing and Quality Assurance (QA), NPPD committed that "Nebraska Public Power District quality assurance group will audit operability of the mobile sirens on a 4-month frequency. If a mobile siren is found inoperable, either by the fireman or by QA, they are to contact Cooper Nuclear Station".

Contrary to that commitment on January 6, 1988, the NRC inspector determined from interviews and licensee records that the licensee had not performed mobile siren testing as committed; but had changed to random test sampling in November 1982. The QA department had discovered the apparent deviation prior to this inspection and reported their findings to the NRC inspector. (298/88-02-03)

REASON FOR THE DEVIATION

A letter from the Nuclear Regulatory Commission (NRC) (John T. Collins to J. M. Pilant dated March 12, 1982) required the District to identify corrective action to be taken in response to findings resulting from the Cooper Nuclear Station (CNS) Emergency Preparedness Exercise. Item 5 of this letter required NPPD to develop methods to assure that mobile siren units remain operable.

The District identified the proposed corrective action in a letter from Mr. Pilant to Mr. Collins (LQA8200024) dated March 19, 1982. The response indicated that the volunteer firemen had agreed to do operability checks during their normal meetings and that the "quality assurance group will audit operability of the mobile sirens on a four month frequency".

As a result of the above correspondence, CNS Quality Assurance developed a QA Surveillance (SC-1900-07) to check the operability of the mobile sirens. It was intended that approximately one-third of the mobile sirens be tested on a four month frequency to enable full coverage each year.

On August 9, 1982 the NRC issued Inspection Report 82-09/82-11 which identified the NRC activities and findings associated with the Emergency Preparedness Exercise and their subsequent investigation. Within that report (Appendix A, Page 8, Paragraph 3) the NRC identified that: "In addition, the licensee's QA staff will perform surveillance testing of each mobile siren unit every 4 months". This wording is different than that contained in the original response to the NRC.

This deviation resulted from personnel error in that the significance of the wording of the NRC Inspection Report was not recognized.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Quality Assurance Surveillance Checklist SC-1900-07 was revised to clearly require testing of each mobile siren. All units were tested in December 1987.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

Quality Assurance Surveillance Checklist SC-1900-07 has been placed on the 1988 Quality Assurance Surveillance Schedule at a four month frequency and has been revised to indicate that it is associated with a NRC commitment.

The scope of this surveillance activity is currently under review, since the mobile sirens are no longer a primary means of notification for the public. A proposal to reduce the testing method and frequency is being considered.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Nebraska Public Power District is currently in full compliance with this commitment.

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

Sincerely,



G. A. Trevors
Division Manager
Nuclear Support

GAT:KMK:rg

cc: U.S. Nuclear Regulatory Commission
Regional Office - Region IV

NRC Resident Inspector
Cooper Nuclear Station