

**SDP/EA REQUEST & STRATEGY FORM**

**Case Data**

Disputed:  Related Cases: \_\_\_\_\_

SDP/EA No.: **04-131** Number: **3** Docket No.: **05000298**

Request Date: **12/09/04** Region: **IV** Case Type: **Rx** Small Entity:  No  Yes

Licensee: **Nebraska Public Power District** Facility / City: **Cooper**

License No.: **DPR-46** Last Day of Insp.: **7/22/04**

Insp. Rpt No.: **R-04-014** Keywords: \_\_\_\_\_ ES: **gkm**

Facts (EATS): Failure to properly restore the service water to its normal configuration following routine maintenance in that the licensee did not realign the gland water following service water maintenance. The failure to realign the gland water was attributed to inadequate instructions. The inadequate instructions led to the cross connection of gland water resulting in a loss of service water redundancy.

Discussion (if required): One >green finding and violation of Criterion V for inadequate written instructions for restoring service water to operable status following maintenance.

NOTE: Additional SERPs were conducted on 9/2/04 and 9/9/04. Discussions involved the licensee's pump analysis as well as the licensee's contention that the LERF was not a factor in determining the significance of the violation because the licensee has stated that they could evacuate to local population in approximately 65 minutes (bad weather included) prior to possible containment breach (up to 5.5 hrs Rx water reaches TAF and lower head breach). The SERP failed to reach a consensus on whether evacuation time estimates should be included in assessing LERF. NRR management will be briefed and asked to assist in resolving this issue.

**SDP**  No  Yes

Assessment:  Green  White  Yellow  Red NOV  Yes  No

**Wrongdoing**  No  Yes

OI Ref. Date \_\_\_\_\_ OI Rpt. No.: \_\_\_\_\_ OI Rpt Date: \_\_\_\_\_

DOJ Referral?  No  Yes Ref. Date \_\_\_\_\_ Action Date \_\_\_\_\_  Decline  Accept

Additional OI Status  OI Investigating  OI needs to be notified  OI/OE dispute memo needed

Additional coordination needed  Awaiting DOJ  Needs coordination with DOJ

**Escalated Action**

Consequence:  Actual  Potential  Reg. Impact  Willfulness

Prior Esc. Action?  No  Yes EA: \_\_\_\_\_ Date: \_\_\_\_\_

ID Credit?  No  Yes  TBD SL:

CA Credit?  No  Yes  TBD Supp:

CP?  No CP  Base  Double Base  Other: \_\_\_\_\_

**Discretion or Order?**  No  Yes Explain: \_\_\_\_\_

**Future Action**

Conference?  No  Yes  Open  Closed Additional \_\_\_\_\_

Action?  No Violation  Re-panel  PEC Letter  Choice Letter  Choice Call  SL / NOV  Re-caucus

Region Issue Esc. Action  Full Package Review by HQ  DEDR Review  Commission  Disagreement  NCV

Other Action? \_\_\_\_\_

Participants:	Region	A. Howell, S. Schwind, K. Fuller, W. Walker, T. Vogel, D. Loveless, G. Shear, D. Chamberlain, G. Sanborn, K. Kennedy, D. Loveless, S. Cochrum
	OE	J. Luehman, G. Morell, C. Nolan OGC/OI
	Program Office	R. Franovich, R. Gibbs, D. Coe, M. Tshiltz, M. Reinhart, S. Richards, S. Meng Wong, B. Palla, S. Lavie, M. Honcharik, See-Meng Wong, A. El-Bassioni, R. Bywater, S. Lavie Other

Approved, Dir. OE: **/RA/ C. Nolan**  
Date: **1/17/05**

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FOIA-2006-0007

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