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COOPER NUCLEAR STATION P.O. BOX 98, BROWNVILLE, NEBRASKA 68321 TELEPHONE (402) 925-3811

Nebraska Public Power District

March 31, 1980

Mr. Karl V. Seyfrit, Director U.S. Nuclear Regulatory Commission Office of Inspection and Enforcement Region IV 611 Ryan Plaza Suite 1000 Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/80-01

Dear Mr. Seyfrit:

This letter is written in response to the letter dated March 10, 1980 transmitting IE Inspection Report No. 50-298/80-01 which indicated that two of our activities were not conducted in full compliance with our license requirements.

Statement of Infraction

Technical Specification 6.3.3A requires that maintenance and test procedures will be provided to satisfy routine inspections, preventative maintenance programs, and operating license'requirements for engineered safeguards and equipment.

Nuclear Station Administrative Procedure 1.3, Section 1.3.5 requires that the above approved written station procedures shall be adhered to by all station personnel.

Contrary to the above, on December 31, 1979, as reported by the licensee in NPPD letter CNSS 800027 from L. C. Lessor to K. Y. Seyfrit dated January 11, 1980, and LER 80-01, operators failed to perform steps in HPCI Surveillance Procedure 6.2.2.3.12 that were signed off as completed. As a result, the HPCI Auxiliary Oil Pump Control Switch remained in the "pull-to-lock" position for approximately 34 hours, rendering HPCI inoperable for automatic initiation during that period. Mr. K. V. Seyfrit March 31, 1980 Page 2.

Corrective Action Taken and Results Achieved

The HPCI Auxiliary Oil Pump control switch was immediately placed in the proper position. The surveillance procedure was again performed to ensure completion of all procedure steps. The personnel involved were interviewed by station management to determine the cause of the occurrence. The cause was determined to be personnel error by the instrument technicians performing the surveillance test and the operations personnel in the control room. A more detailed event discussion may be found in LER 50-298/80-01.

An Instruction Letter was written to the Operations Department outlining steps to be taken to minimize personnel errors during performance of surveillance procedures. The use of "red arrows" on the control panels was instituted. They denote any switch which is changed from its normal position which is not covered by an equipment clearance order during the performance of surveillance tests.

Corrective Action to be Taken to Avoid Further Noncompliance

The control switch for the HPCI Auxiliary Oil pump will be annunciated when it is in the "pull-to-lock position. Other safety feature systems were reviewed for similar deficiencies in annunciation, but none were found.

Date When Full Compliance Will be Achieved

Full compliance was achieved on January 2, 1980 when the switch was returned to its proper position. The installation of the annunciator will be achieved at the first plant outage after receipt of the hardware for the annunciator installation.

Statement of Deficiency

Technical Specification 6.3.4 requires that radiation control procedures be maintained and made available to station personnel.

Radiation protection and control procedures 9.1.1.1, 9.1.2.1 and 9.1.2.2 A quire that contaminated areas be posted with signs indicating atrance requirements and that station employees abide by these procedural requirements. On March 6, 1980, a sign on the High Pressure Coolant Injection (HPCI) room door indicated that persons entering the area should wear, as a minimum, protective shoe covers and gloves.

Contrary to the above, the NRC inspector observed a station operator working in the HPCI room without the required protective clothing. Mr. K. V. Seyfrit March 31, 1980 Page 3.

Corrective Action Taken and Results Achieved

The station operator was surveyed for contamination as he left the area and his clothing was decontaminated as required.

Corrective Action to be Taken to Avoid Further Noncompliance

The individual involved was interviewed by the Operations Supervisor, the Chemistry and Health Physics Supervisor, and the Station Superintendent. It was determined that he apparently neglected to notice the radiological control signs posted in the area. The radiological control program was reviewed in general for any detrimental trends. None were noted, in fact, past experience with this individual and other plant personnel indicates a high degree of awareness of radiological control practices and procedures.

Date When Full Compliance Will be Achieved

We are now in full compliance.

If you have any questions regarding this response, please contact me.

Sincerely,

J. M. Pilant Director of Licensing and Quality Assurance

JMP:PJB:cg