

Nebraska Public Power District

COOPER NUCLEAR STATION
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LQA8000434

October 16, 1980

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

Subject: NPPD Response to IE Inspection Report No. 50-298/80-13

Dear Mr. Seyfrit:

This letter is written in response to IE Inspection Report No. 50-298/80-13.

Statement of Violation

10 CFR 55, Appendix A, Requalification Program Requirements, requires that the requalification program include pre-planned lectures on a regular and continuing basis throughout the license period in those areas where annual operator and senior operator written examinations indicate that scope and depth of coverage is needed. This is amplified in Cooper Nuclear Station's requalification program approved by NRR on August 18, 1976 which states, "With the exception of special activity periods, such as refueling outages, the lecture series will be spread reasonably evenly throughout each year."

10 CFR 55, Appendix A, Requalification Program Requirements, also requires the requalification program include written examinations which determine licensed operator's and senior operator's knowledge of subjects covered in the requalification program and provide a basis for evaluating their knowledge of abnormal and emergency procedures. The licensee's approved requalification program, states, "Written examinations shall be given covering material presented in the requalification program lecture series."

Contrary to the above:

1. The licensee had not initiated a requalification program lecture series for the 1980 training cycle beginning in February 1980.

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Mr. Karl V. Seyfrit
October 16, 1980
Page 2.

2. Requalification Quiz No. 22, administered in November 1979, had not been graded to determine the knowledge that licensed operators and senior operators had in the subjects covered in the requalification program lecture series.

This is an infraction (289/80-13-01).

Discussion of Violation

We take issue with the first part of this infraction in that we were, at the time of the inspection, making a reasonable effort toward implementing our requalification program. The 1980 training cycle started in February 1980. During this month the 1980 requalification exam was administered. The 1980 refueling and maintenance outage extended from March 1, 1980 through about June 6, 1980. During the outage and the months of June, July, and August, which are heavy vacation periods, the requalification lecture series was not initiated. During July we also were forced to shutdown per IE Bulletin 80-17.

The decision not to start the requalification training was based on, (1) the February 1980 requalification exam score average was 89% and no individual section score was below 70%; (2) that time is not available during refueling outage; and (3) many people were on vacation, had the training been scheduled during June, July, and August.

The first part of our requalification program for all station personnel in the areas of Security, Radiation Protection, Hands-on Fire Training and Fire Chief Training commenced on September 2, 1980. This program was completed on October 2, 1980 and the remainder of the licensed operator requalification program, which had not been formally scheduled at the time of the inspection, was formally scheduled and commenced on October 7, 1980.

We believe this program was reasonably spread throughout the year considering the extenuating circumstances which existed. This was explained to the inspectors at the exit interview. We feel we were and are now in full compliance.

We recognize that the second part of the infraction violated the intent of our training requalification program and corrective action is addressed below.

Corrective Steps Taken and Results Achieved

The requalification quiz was graded. All scores were satisfactory.

Mr. Karl V. Seyfrit
October 16, 1980
Page 3.

Corrective Steps to Avoid Further Noncompliance

The responsible personnel have been informed that quizzes must be graded promptly to assure proper monitoring of the requalification program.

Date When Full Compliance Will Be Achieved

We are currently in full compliance.

Notice of Deviation

Based on the results of an NRC inspection conducted on September 8-11, 1980, it appears that certain of your activities were not conducted in full conformance with your commitment to the Commission as indicated below:

The licensee's approved operator requalification program states that "A planned lecture series shall be presented covering, as a minimum, those areas where annual examinations indicate the need for additional training in the following subjects:

"1. Theory and principles of operation.

"10. Station QA program as related to station operations."

In deviation from the above, the annual examination administered in February - April, 1980, did not address the subject of "Station QA program as related to Station operations" (298/80-13-04).

Discussion of Deviation

The topic "Station QA program as related to station operations" was added to the nine existing requalification topics at the time of our program revision in 1976. This was at the insistence of the NRC and was intended to ensure that operations personnel kept current concerning QA practices and procedures. Since that time, operators as well as certain other station personnel have been included in a QA requalification program. We did not consider and still do not consider that the above stated requirement specifically meant that a test question must cover that area. We also discussed this matter with an Operator Licensing Branch member during his last visit at this site. He concurred with our interpretation. QA policies and procedures are covered in general under the Administrative Procedures section of the exam. Most Administrative Procedures relate to or support the 18 Criteria of 10 CFR 50, Appendix B.

Mr. Karl V. Seyfrit
October 16, 1980
Page 4.

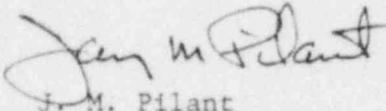
Corrective Action Taken

The requalification program guide was revised October 1, 1980 in response to the March 28, 1980 letter from H. R. Denton concerning operator training. The revised program omits the specific reference to Q.A. training; this training will be given as part of the Station QA Training which is given to most station employees.

We also feel we were and are now in full compliance.

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

Sincerely,



J. M. Pilant
Director of Licensing
and Quality Assurance

JMP:PJB:cg