

DEC 5 1989

In Reply Refer To:
Docket: 50-298/89-28

Nebraska Public Power District
ATTN: George A. Trevors
Division Manager - Nuclear Support
P.O. Box 499
Columbus, Nebraska 68602-0499

Gentlemen:

Thank you for your letters of September 25 and November 9, 1989, in response to our letter and Notice of Violation dated August 21, 1989, and the subsequent telephone call between Region IV staff and members of the NPPD staff on October 4, 1989. We have reviewed your replies and find them 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,

Original Signed By:
Samuel J. Collins

Samuel J. Collins, Director
Division of Reactor Projects

cc:
Nebraska Public Power District
ATTN: G. D. Watson, General Counsel
P.O. Box 499
Columbus, Nebraska 68601

Cooper Nuclear Station
ATTN: Guy R. Horn, Division
Manager of Nuclear Operations
P.O. Box 98
Brownville, Nebraska 68321

RIV:RI:PSS *CP*
JBoardman/cjg
12/1/89

C:PSS *TS*
TStetka
12/1/89

D:DRS *DRS*
LJCallan *12/1/89*
12/1/89

D:DRP *DRP*
SJCcollins
12/1/89

IE01
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Nebraska Public Power District

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Nebraska Department of Environmental
Control

ATTN: Dennis Grams, Director
P.O. Box 98922
Lincoln, Nebraska 68509-2922

Nemaha County Board of Commissioners

ATTN: Larry Bohlken, Chairman
Nemaha County Courthouse
1824 N Street
Auburn, Nebraska 68305

Department of Health

Division of Radiological Health
ATTN: Harold Borchart, Director
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509-5007

Kansas Radiation Control Program Director

U.S. Nuclear Regulatory Commission

ATTN: Senior Resident Inspector
P.O. Box 218
Brownville, Nebraska 68321

U.S. Nuclear Regulatory Commission

ATTN: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

bcc to DMB (IE01)

bcc distrib. by RIV:

R. D. Martin

Section Chief (DRP/C)

DRSS-FRPS

RIV File

RSTS Operator

P. O'Connor, NRR Project Manager (MS: 13-D-18)

DRS

J. Boardman

T. Stetka

Resident Inspector

Lisa Shea, RM/ALF

MIS System

Project Engineer (DRP/C)

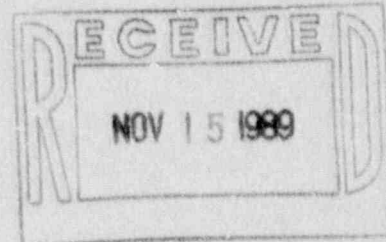
DRP



Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499
TELEPHONE (402) 534-8561

NLS8900416
November 9, 1989



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

Subject: Supplemental Response to Inspection Report 50-298/89-28
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

Reference: Letter, G. A. Trevors to USNRC dated September 25, 1989, "NPPD
Response to NRC Inspection Report 50-298/89-28"

Gentlemen:

This is written in response to the letter from Mr. James L. Milhoan dated October 10, 1989, requesting additional information concerning the District's response to the violation discussed in NRC Inspection Report 50-298/89-28. Additional information is supplied below to supplement the response contained in the reference.

Corrective Steps Which Have Been Taken and the Results Achieved

A random sample (10%) of the design changes, classified as Essential, that were implemented during the 1988 and 1989 Refueling Outages, was selected for a detailed review. For each of these design changes, the associated On-The-Spot Changes (OSC's) were evaluated to ensure that the design basis or design criteria of the design change was not altered. No discrepancies were noted as a result of this review.

In addition to the above, design changes that implemented activities described in a NRC Safety Evaluation Report on the Cooper Nuclear Station Docket were reviewed. These design changes, dating back to 1984, involved the following.

- Primary Containment Purge and Vent Valve Orientation and Actuators
- Primary Containment Purge and Vent Debris Strainers
- Reactor Vessel Water Level Reference Leg Fill
- IRM/SRM Loss of Negative Voltages Sensing Relays
- Automatic Depressurization System Actuation Logic

Again, the associated OSC's were reviewed for any impact or alteration to the design criteria or basis of the design change and additionally, for any effect on the SER. This review also revealed no discrepancies.

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Accordingly, based on a lack of any additional discrepancies from the above two reviews of design changes, it is the District's position that the situation noted in the violation was an isolated instance of misapplication of an OSC and that no programmatic deficiencies exist in the implementation of OSC's in the District's design change process.

Corrective Steps Which Will Be Taken To Avoid Further Violations

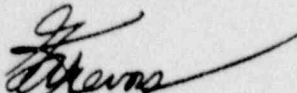
To avoid further violations, Engineering Procedure 3.4.10, "Revision, Amendments and On-The-Spot Changes" will be revised to require the Design Engineers to verify that proposed OSC's will not modify the design basis or design criteria of the design change package. If the answer is yes, the revised procedure will indicate that an OSC is not allowed. Documentation of this review will also be required by the revised procedure along with the Design Engineer's signature. This procedure change will be implemented in lieu of changing Engineering Procedure 3.3, "Station Safety Evaluations" as discussed in the reference.

Date When Full Compliance Will Be Achieved

The Revision to Engineering Procedure 3.4.10 will be implemented by December 1, 1989.

If you have any questions regarding this information, please contact my office.

Sincerely,



G. A. Trevors
Division Manager
Nuclear Support

/rg

cc: ✓ Regional Administrator
USNRC - Region IV

NRC Resident Inspector
Cooper Nuclear Station