

JAN 18 1990

In Reply Refer To:
Docket: 50-298/89-33

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 letter of December 27, 1989, in response to our letter and Notice of Violation dated November 27, 1989. We have reviewed your reply and find it 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
G. L. Constable
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

Nebraska Department of Environmental
Control
ATTN: Dennis Grams, Director
P.O. Box 98922
Lincoln, Nebraska 68509-8922

RIV:C:DRP/C
GLConstable
for 1/18/90

D:DRP
SJC Collins
1/18/90

9001260209 900118
PDR ADUCK 05000298
Q PDC

IE01
11

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)

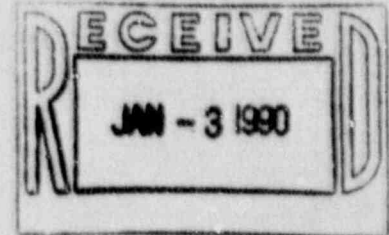
Resident Inspector
Lisa Shea, RM/ALF
MIS System
Project Engineer (DRP/C)
DRP
DRS



Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499
TELEPHONE (402) 564-8561

NLS8900473
December 27, 1989



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

Subject: NPPD Response to NRC Inspection Report 50-298/89-33

Gentlemen:

This letter is written in response to your letter dated November 27, 1989, transmitting Inspection Report 50-298/89-33. Therein you indicated that certain of our activities were in violation of NRC requirements.

Following is the statement of the violation and our response in accordance with 10 CFR 2.201:

STATEMENT OF VIOLATION

Inadequate Access Control

Technical Specification 6.3.2.B requires that security procedures shall be established and implemented.

Plant Services Procedure 1.1, "Station Security," Revision 12, dated August 24, 1989, Section V.D.3.b, requires that the Security Department temporarily inactivate an individual's badge when retraining requirements have not been accomplished.

Contrary to the above, on October 12, 1989, it was discovered that the Security Department had not temporarily inactivated the badge of an individual whose retraining requirements had not been accomplished, and the individual had been allowed unescorted access to protected and vital areas for 114 days after his training had expired. Subsequently, it was determined that the Security Department had not inactivated the badges of 19 other personnel whose training had expired. This is a repeat violation of one identified in October 1988.

This is a Severity Level IV violation. (Supplement III)(298/8933-01)

REASON FOR VIOLATION

As stated in our response to an identical violation cited in NRC Inspection Report 88-31, the Nuclear Training Department is responsible for notifying CNS of overdue training requirements. This notification is developed from records of training maintained by the Nuclear Training

IC-90-008 ~~4001080082~~ 311

Department. The training records in question, namely those that are related to receiving and maintaining unescorted access to CNS, are contained in computer files backed up by "hard copy" files. One of the corrective actions completed in response to the 1988 violation was to validate the computer data against the "hard copy" files and to initiate a monthly report notifying appropriate management levels of due and overdue CNS access training requirements. This monthly report was prepared from data contained in the computer files.

This violation was the result of clerical errors made in the entry and retrieval of unescorted access training data from the computer files. These errors were transmitted in the monthly reports which were typed up using the computer generated data. The method being used to validate and verify the training data being entered into the computer was not effective in eliminating errors in the data base.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A manual search of the subject "hard copy" training records was performed to identify all badged personnel and their training status. It was during this review that nineteen (19) other individuals were identified with expired access training. This information was forwarded to CNS management and appropriate action was taken to temporarily inactivate access to CNS for these individuals until the training requirements were met.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

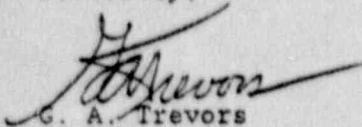
In recognition of the difficulties that were being experienced in the use of the computerized training records system, and as discussed in our response to NRC Inspection Report 88-31, the District conducted a thorough review of training tracking activities during the first quarter of 1989. As a result of this review a Nuclear Power Group Training Tracking System Task Force was established in May 1989 to oversee the development of an entirely new computerized training records system for the Nuclear Power Group. This system is named the Training Tracking System (TTS). Following approval of the TTS Design Report in July the system installation phase was commenced in August 1989. The design of this new system provides for improved validation and verification of data. It was anticipated that this system would be fully operational during the final quarter of 1989. System acceptance testing during November and December, however, uncovered flaws in the program which required design rework. These discrepancies have been corrected and the TTS is expected to be back in final acceptance testing during the first week of January 1990. The Training Tracking System is scheduled to be fully functional for training records related to CNS site access by March 1, 1990.

In the meantime, site access training requirements are being tracked manually and the monthly due and overdue management reports are being developed from a search of the "hard copy" files.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The District is currently in compliance with station security procedures relative to training requirements.

Sincerely,



G. A. Trevors
Division Manager
Nuclear Support

/rg

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

NRC Resident Inspector
Cooper Nuclear Station