## APPENDIX B

## NOTICE OF VIOLATION

Nebraska Public Power District Cooper Nuclear Station

Docket No. 50-298

Based on the results of the NRC appraisal conducted May 5-16, 1980, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license as indicated below. These items are infractions.

A. Technical Specification 6.1.4 states, "The minimum qualifications, training, replacement training, and retraining of plant personnel at the time of fuel loading or appointment to the active position shall meet the requirements as described in the American National Standards Institute N18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants." Section 4.5.2 of ANSI N18.1-1971 states, in part, "Technicians in responsible positions shall have a minimum of two years of working experience in their specialty."

Contrary to the above requirement, at the time of the appraisal, two health physics technicians having approximately six and ten months of working experience in their specialty, respectively, had been appointed to responsible positions on the health physics staff.

B. Technical Specification 6.3.5 states, in part, "... each high radiation area shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by requiring notification and permission of the shift supervisor. Any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area."

Contrary to the above requirement, during the period May 5-16, 1980, individuals were observed entering the reactor drywell, a high radiation area, without notifying the shift supervisor and without being provided with sufficient radiation monitoring devices to continuously indicate the radiation dose rate in the area in which they were working.

C. 10 CFR 20.103, "Exposure of individuals to concentrations of radioactive materials in air in restricted areas," states in Section (c), "When respiratory protective equipment is used to limit the inhalation of airborne radioactive material pursuant to paragraph (b)(2) of this section, the licensee may make allowance for such use in estimating exposure of individuals to such materials provided that such equipment is used as stipulated in Regulatory Guide 8.15, "Acceptable Programs for Respiratory Protection."