APPENDIX A

NOTICE OF VIOLATION

Nebraska Public Power District
Cooper Nuclear Station

Docket: 50-298
Operating License: DPR-46

During an NRC maintenance team inspection (MTI) conducted from November 13 through December 21, 1989, two violations of NRC requirements were identified. The violations involved failures to follow procedures or inadequate procedures and failure to perform a required QC inspection. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violations are listed below:

A. Failure to Follow Procedures/Inadequate Procedures

Criterion V of Appendix B to 10 CFR Part 50 states, that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Four instances were identified in which licensee personnel either failed to follow procedures or in which licensee procedures were inadequate.

1. Cooper Nuclear Station (CNS) Operations Procedure 2.0.2, "Operations Logs and Reports," Revision 13, required that valve LV 123W-11, Core Spray Pump 1B suction from the Torus, be sealed in the open position.

   Contrary to the above, on November 13, 1989, the inspector observed that valve LV 123W-11 was in its required open position but was not sealed as required.

2. CNS Procedure 0.9, "Equipment Clearance and Release Orders," Revision 9, Section IV.A.1 required that personnel obtain an equipment clearance and release order for work or operation of CNS systems requiring that the system (or portion of the system) not be operated or that it be placed in a specific configuration (not normal) for the safe conduct of the work or operation.

   Contrary to the above, the team identified the following four instances in which appropriate clearances were not used to tag the equipment taken out of service as required:

   a. MWR 89-2189 replaced the service water flow indicator (SW-FI-385A). Both mechanical tubing and electrical leads had to be disconnected and reconnected but were not tagged.

b. MWR 89-2728 lifted and relocated limit switch rotor leads on Drywell Spray Loop A Inboard Isolation Valve RHR-MO-M013A. The lifted leads were not tagged as required, and no electrical clearance was established.

c. MWR 89-2876 removed the motor from steam supply to augmented off-gas downstream shutoff valve (RHR-MO-921MV) to extract stainless steal lockwire that was jamming the motor drive. No electrical clearance was set for disassembly of the valve actuator.

d. MWR 89-3206 repaired Service Water Solenoid Pilot Valve SW-SOV-SPV857, including replacement of a wetted solenoid. No clearance was set for the electrical circuitry involved.

3. Cooper Nuclear Station, "Quality Assurance Program for Operation, Policy Document," Revision 5, dated June 7, 1989, Section 2.13, committed the licensee to follow the guidance of ANSI N45.2.2-1972. ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants." Section 2.7.1 of this standard defines Level A items as those items exceptionally sensitive to environmental conditions and require special measures for protection from one or more of the following effects: temperature, humidity and vapors, physical damage, and airborne contamination. Section 6.4.1 of the standard prescribed for items in storage the requirements for periodic inspection and examination and the subsequent documentation of the results. Section 6.6 required preparation of written records that include such pertinent information as storage location, inspection results, protection, and personnel access.

   Contrary to the above, Plant Services Procedure 1.7, "Warehouse Storage," Revision 5, dated December 23, 1987, did not comply with these ANSI requirements in that:

   a. No temperature or humidity limits were identified for protection of the Level A storage items.

   b. No provisions were implemented for recording temperature and humidity conditions for Level A items.

   c. Requirements for periodic inspections and examinations were specified, but not implemented.

4. Plant Service Procedure 1.6, "Warehouse Marking and Tagging," Revision 5, dated June 4, 1988, Section V.3.2.a(2) required that parts scheduled for future troubleshooting or evaluation shall be identified with a "HOLD" tag.

   Contrary to these requirements, on December 4, 1989, the inspectors observed untagged electrical parts on a dolly in the licensee's warehouse. Similarly, ASCO solenoid valves located in Level A storage had an "ACCEPT" tag attached to the valves, which were marked

to indicate that the shelf-life of the internal components had expired, and that it was necessary to get a rebuild kit prior to installing the valves in the plant. The "HOLD" tag required by the above procedure was not attached to the valves.

This is a Severity Level IV violation. (Supplement I)(298/8931-01)

B. Failure to Perform Required Quality Control Inspections

Criterion X of 10 CFR 50, Appendix B, requires that "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. Such inspection shall be performed by individuals other than those who performed the activity being inspected. Examinations, measurements, or tests of material or products processed shall be performed for each work operation where necessary to assure quality. If mandatory inspection hold points, which require witnessing or inspecting by the applicant's designated representative and beyond which work shall not proceed without the consent of its designated representative are required, the specific hold points shall be indicated in appropriate documents."

Quality Control (QC) Procedure 12.5, "CNS QC Functions," Revision 4, was established to implement this requirement and required that QC inspections be performed on maintenance activities such as critical reassembly steps, critical measurements and clearances, and verification of valve timing and timing clearances.

Contrary to the above, on May 16, 1989, licensee personnel performed maintenance, MWR 89-2344, on the emergency diesel generator cam which included critical reassembly steps, critical measurements and clearances, and verification of valve timing and timing clearances. However, QC inspections of these activities were not performed.

This is a Severity Level IV violation. (Supplement I)(298/8931-02)

Pursuant to the provisions of 10 CFR 2.201, Nebraska Public Power District is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 31st day of January 1990