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Nebraska Public Power District

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56-298

November 23, 1982

Mr. Richard C. DeYoung
Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. John T. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Gentlemen:

Pursuant to discussions between NPPD and the NRC Staff at the November 16, 1982, meeting held at Cooper Nuclear Station to discuss the NRC's proposed enforcement action, it was requested that NPPD provide additional information. Attached please find the requested information in the form of NPPD's Supplemental Response to Order Modifying License Effective Immediately.

Sincerely,

NEBRASKA PUBLIC POWER DISTRICT

Cecil R. Jones
Assistant General Manager

CRJ/bms

Attachment: Supplemental Response to Order Modifying License Effective Immediately

I hereby swear that the statements contained in the attached Supplemental Response to Order Modifying License Effective Immediately are true and correct to the best of my knowledge and belief.

C. R. Jones

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Subscribed and sworn to before me this 23rd day of November, 1982.

GENERAL NOTARY - State of Nebraska
JANIE THOMAS AS
My Comm. Exp. Sept. 1, 1986

Notary Public

IE-14

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	Docket No. 50-298
Nebraska Public Power District)	License No. DPR-46
Cooper Nuclear Station)	EA 82-46

SUPPLEMENTAL RESPONSE TO
ORDER MODIFYING LICENSE
EFFECTIVE IMMEDIATELY

On October 8, 1982, Nebraska Public Power District ("NPPD") filed, inter alia, its Response to Order Modifying License Effective Immediately. In subsequent discussions with the Nuclear Regulatory Commission ("NRC") Staff on November 16, 1982, NPPD was requested to supplement this Response with additional information regarding items (3) and (4) of the comprehensive plan of action set forth in Section IV of said Order. This document serves as NPPD's supplemental Response.¹

In supplementing its Response, NPPD wishes to stress that the corrective actions described below are reflective of NPPD's re-emphasis on the necessity to provide correct and accurate information to the NRC. This is not to say that NPPD has operated under a lesser standard in the past; rather, these positive steps are directed to enhance and improve existing procedures and activities to provide accurate information to the NRC. Items (3) and (4) of Section IV of the Order are as follows:

- (3) Actions to assure that future information supplied by Nebraska Public Power District to the NRC, pertaining to analyses, designs, and the compliance of systems important to safety, is complete and accurate.

¹

As we have previously stated, in the event the proposed enforcement action is not satisfactorily resolved, NPPD preserves its right to challenge any portion of the enforcement action.

- (4) A system of audits by management representatives aimed at assuring conformance to requirements and continued adherence to changes which result from the reviews identified in items (1) and (3) above.

With regard to item (3) of Section IV of the Order, NPPD describes the following relevant actions which have been taken:

3.1. NPPD did not delegate preparation of its Response to the proposed enforcement action to lower level staff; rather, top management, as well as key personnel in the Licensing and Nuclear Engineering Departments have been extensively involved in the investigation of the facts and the preparation of the Response. The result has been to reinforce upon such individuals the need for attention to detail so as to assure that complete and accurate information is provided to the NRC. In addition, the involvement of top management in this entire matter has impressed upon the staff involved in nuclear activities the importance of rigorous conduct of nuclear activities and the need for conscientious attention to detail.

3.2. NPPD management has issued a memorandum reaffirming and emphasizing the need for the highest standards of accuracy in all oral and written communications, studies and reports submitted to the NRC.

3.3. The NPPD Licensing Department has formalized a procedure intended to assure that complete and accurate information is provided the NRC. The elements of this procedure are set forth below:

- a. Upon receipt of an NRC letter on the Cooper Nuclear Station Docket, the Division Manager of Licensing and Quality Assurance and/or Licensing Manager will assign task responsibility as appropriate.
- b. Task assignment entered into Licensing Department's action item tracking system.

- c. Upon receipt of documentation that the task has been completed, information will be put in proper format for submittal to NRC by Licensing Department - any substantive revision requires matter be sent back to originating department for review and final recommendation.
- d. Division Manager of Licensing and Quality Assurance determines whether additional review of proposed submittal is necessary - if so, proposed submittal may be sent to one or more of the following groups:
 - Safety Review and Audit Board
 - Quality Assurance Department
 - Station Operations Review Committee
 - Others as appropriate

If any of the above groups reviewed the proposed submittal and recommend substantive changes be made, such recommendations shall be transmitted to originating department for its review and final recommendations.

- e. Distribution of NPPD submittal and entry into document retrieval system.

3.4. The NPPD Nuclear Engineering Department (NED) has implemented a new procedure so as to more formally involve said Department with the Licensing Department in the preparation of material for submittal to NRC. The elements of this procedure are set forth below:

- a. Task assignment received from Licensing Department.
- b. Task assigned by NED Manager to appropriate Supervisor and entered into document log status book.

- c. Supervisor assigns task to appropriate member of NED staff.
- d. Status periodically reviewed by person in charge of document log status book.
- e. Status of work periodically reviewed by appropriate Supervisor in NED.
- f. Appropriate Supervisor reviews final product and forwards to NED Manager.
- g. NED Manager reviews final product, and transmits over his signature to Licensing Department.
- h. Status logs updated.

3.5. NPPD has increased the staff of its Nuclear Engineering Department by authorizing positions for 11 full-time engineers, 2 co-op engineers and 2 technicians. All but one of these positions have been filled. (This increase approximately triples the size of the Nuclear Engineering Department). The additional staff demonstrates NPPD's commitment to rigorous conduct of nuclear activities and attention to detail.

3.6. NPPD has also increased the staff of its Licensing Department by authorizing and filling the position of Licensing Specialist. Again, this additional staff demonstrates NPPD's commitment.

3.7. NPPD has promoted a Licensing Department engineer to the Nuclear Engineering Department as a supervisor whose previous experience will reinforce and facilitate rigorous conduct of Nuclear Engineering Department activities in the licensing process.

3.8. NPPD, through its Safety Review and Audit Board, has directed the institution of a comprehensive training program for general office personnel involved in the managerial and technical support of Cooper Nuclear Station.

Although the scope of the program is not finalized, it is contemplated that the Nuclear Engineering Department training program will include training on the rigorous conduct of nuclear activities. Topics for instruction will include the following:

- a. NPPD organization (general office and Cooper Nuclear Station).
- b. Communications and practices at and between the general office and Cooper Nuclear Station.
- c. Areas of general office support for plant activities.
- d. Plant licensing documents and processes.
- e. Nuclear Regulatory Commission organization.
- f. Applicable NRC regulations and guides.
- g. NPPD policies, procedures, goals and objectives.

With respect to the need to provide complete and accurate information to the NRC, it is contemplated that the facts associated with the instant enforcement action will be used as a case example.

3.9. NPPD has established a surveillance program that verifies the status of the early warning system at least every four months.

3.10. NPPD has recognized the need to verify with NRC, at an early stage, the scope of new regulatory requirements and the need for NPPD to clearly indicate to NRC NPPD's proposed means of satisfying such requirement. NPPD raised this matter with NRC at the November 16, 1982, meeting at Cooper Nuclear Station and efforts are being pursued to achieve this goal.

With regard to item (4) of Section IV of the Order, NPPD provides the following system of surveillance/monitoring:

4.1. Procedures that have been developed as described in 3.3 and 3.4 above regarding the Licensing and Nuclear Engineering Departments will be reviewed annually pursuant to Quality Assurance Plan 2000.

4.2. It is contemplated that the implementation of the training program referenced in item 3.8 above will be documented and effectiveness of such program shall be periodically monitored.

4.3. With reference to item 3.9 above, the 120 day surveillance program is conducted by the Quality Assurance Department.

4.4. With reference to item 3.2 above, the memorandum to employees involved in nuclear activities will be reissued periodically.

4.5. Until the Management Appraisal has been completed and any changes determined and implemented, NPPD cannot state what surveillance and monitoring, if any are appropriate, are needed to assure such changes are conformed and adhered to.

In addition to the above material, NPPD, consistent with discussions with the NRC Staff at the November 16, 1982, meeting, and with the Region IV Administrator on November 19, 1982, has revised the Appraisal program set forth in Attachment 1 to its initial Response to Order Modifying License Effective Immediately. This revised Appraisal program was previously submitted to the NRC by letter dated November 19, 1982.

November 23, 1982