

APPENDIX A

NOTICE OF VIOLATION

Nebraska Public Power District
Cooper Nuclear Station

Docket: 50-298
License: DPR-46

Based on the results of an NRC inspection conducted during the periods August 31 - September 4 and September 14-18, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

A. Failure of Safety Review and Audit Board (SRAB) to Review Audit Program Status

Technical Specification 6.2.1.B requires that selected aspects of plant operations be audited by the SRAB. The frequency of the audit shall be such that all aspects of plant operations are audited at least every two years. The Technical Specification further states that the SRAB should review the status of the audit program at least twice per year to assure that such audits are being performed in accordance with the Technical Specifications.

Contrary to the above requirements, the SRAB failed to conduct a review of the status of the audit program between April 1980 and August 1981, a time during which SRAB audits were not being performed in accordance with the established schedule.

This constitutes a Severity Level IV violation (Supplement I.D.).
(8114-01)

B. Failure to Follow Requirements of Approved Operator Requalification Program

10 CFR Part 50.54 states, in part, "Notwithstanding the provisions of 50.59, the licensee shall not, except as specifically authorized by the Commission, make a change in an approved operator requalification program by which the scope, time allotted for the program or frequency in conducting different parts of the program is decreased." The approved operator requalification training program for Cooper Nuclear Station states, in part, in paragraph III.B, "A grade of less than 80% correct on any lecture series examination shall require an operator or senior operator to be rescheduled for lectures on that subject the next time such lectures are scheduled." The approved operator requalification for Cooper Nuclear Station also states, in part, in paragraph II.A, "A planned lecture series shall be presented covering, as a minimum, those areas where annual written examinations indicate the need for additional training in the following subjects: . . .

". . . 9. Applicable portions of 10 CFR, Chapter I."

Contrary to the above, the NRC inspector found:

1. The licensee had implemented portions of a revised operator requalification training program without Commission authorization. Paragraph III.B of this program reduced the minimum acceptable grade on a lecture series examination to 70% correct.
2. In the annual written examination for operator and senior operator requalification given in March 1981, the licensee did not include any questions concerning 10 CFR, Chapter I and thereby had no basis to determine whether the requalification training program for 1981-82 should contain training relative to 10 CFR, Chapter I. No such training had been scheduled.

This is a Severity Level V violation (Supplement I.E.). (8114-02)

C. Failure to Post Radiation Area

10 CFR 20.202, paragraph (b)(2) defines a "radiation area" as any area, accessible to personnel, in which there exists radiation, originating in whole or part within licensed material, at such levels that a major portion of the body could receive in any one hour a dose in excess of 5 millirem, or in any five consecutive days, a dose in excess of 100 millirem. 10 CFR 20.203(b) requires that each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words "Caution - Radiation Area." These requirements are implemented in the licensee's Procedure 9.1.2.2, Revision 4, "Area Posting and Access Control," which requires further that areas meeting the definition of a radiation area be posted "Caution - Radiation Area" with clearly defined boundaries.

Contrary to the foregoing requirements, a work/storage area adjacent to the ambulance garage and NRC resident reactor inspector's office contained twenty boxes of radioactive material for which measured radiation levels were 5 to 8 millirems per hour at approximately eighteen inches from the surface, and the area was not posted as a radiation area, nor was a clearly defined boundary provided around the boxes.

This constitutes a Severity Level V violation (Supplement I.E.).
(8114-03)

Pursuant to the provisions of 10 CFR Part 2.201, Nebraska Public Power District is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid violations; and (3) the date when full compliance will be achieved. Under this authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

The response directed by this Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Dated: October 23, 1981



W. C. Seidle, Chief
Engineering Inspection Branch