



Nebraska Public Power District

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November 23, 1981

Mr. W. C. Seidle, Chief
Engineering Inspection Branch
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/81-14

Dear Mr. Seidle:

This letter is written in response to your letter dated October 23, 1981, transmitting IE Inspection Report No. 50-298/81-14. You indicated that certain of our activities were not conducted in full compliance with NRC requirements.

Following is a statement of the non-compliance and our response in accordance with 10CFR2.201.

Statement of Violation

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)

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Corrective Action Which Has Been Taken to Avoid Further Violations

The computerized Licensing Department Action Item Tracking System (AITS) has been revised to track the status of all SRAB audits. The AITS tracks attributes such as audit description, due date, source of the audit requirement, auditor assigned by SRAB, and whether the audit is overdue. A detailed history of previous audit activities will also be maintained on the computer in the format of an executive summary.

The Licensing Department Procedure C.10 "SRAB Routing; Audit Tracking; and Meeting Procedure" has also been revised to ensure that the SRAB Secretary/Alternate Chairman monthly receives a sort of the complete status of all SRAB audits, and a sort of the SRAB audits which are due during the current month. Additionally, this procedure has been revised to include the discussion of SRAB audits as a standing agenda item for every SRAB meeting.

Date When Full Compliance Will Be Achieved

We believe that we are currently in full compliance.

Statement of Violation

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)

Corrective Steps Which Have Been Taken and Results Achieved

1. The minimum acceptable grade on a lecture series examination will be maintained at 80% correct until approval of the revised requalification program which was submitted for NRC approval on October 1, 1980. The importance of using only approved documents was discussed with those concerned.

Corrective Steps Which Will Be Taken to Avoid Further Violation

The inspection report and the response will be discussed with those responsible for the use of the unapproved program.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 15, 1981.

Discussion

2. No corrective action was deemed necessary. Analysis of the examination in question showed that one question and part of another pertained directly to definitions or concepts in 10 CFR 20 and 10 CFR 100. We believe that the requirement stated above was, therefore, satisfied.

Statement of Violation

- C. 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)

Discussion

The work/storage area described in the statement of violation was used to store mendable protective clothing until such mending could take place. When the first few boxes of mendable clothing was placed in the area they were properly posted "Radioactive Material". Even though radiation levels were less than the radiation area criteria, a yellow and magenta rope boundary was set up to aid in the control of the area. Later, additional boxes of mendable protective clothing was added to the posted area, thus creating a radiation area. Updating the posting and moving the boundary markers had not been completed as required to meet radiation area posting requirements.

Corrective Steps Which Have Been Taken and the Results Achieved

All of the protective clothing has been removed from this work/storage area.

Corrective Action Which Will Be Taken to Avoid Further Violation

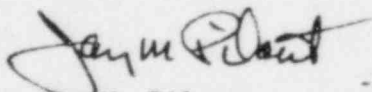
Appropriate sections of IE Inspection Report No. 50-298/81-14 describing this posting violation will be routed to Health Physics personnel for review. CNS Procedure 9.1.2.2, "Area Posting and Access Control," will also be routed to Health Physics personnel for review. In the future, if the storage of mendable protective clothing is required, it will be stored within the main plant structures.

Date When Full Compliance Will Be Achieved

We are at present within compliance as was stated in the "Details" section, Item 3 of the subject inspection report.

Should you have any questions or require additional information regarding the above, please contact me.

Sincerely,



Jay M. Pilant
Division Manager of Licensing
and Quality Assurance

JMP:cmk