

Docket No. 50-298

APR 2 1982



Mr. J. M. Pilant, Director
 Licensing & Quality Assurance
 Nebraska Public Power District
 P.O. Box 499
 Columbus, Nebraska 68601

Dear Mr. Pilant:

Subject: TMI Action Plan Items I.A.1.3(1), I.C.5, and I.C.6 as
 Described in NUREG-0737

RE: Cooper Nuclear Station

We have completed our review of your submittals concerning the subject TMI Action Plan items for Cooper Nuclear Station (CNS). Our conclusions on each item are as follows:

Item No. I.A.1.3(1) - Shift Manning Overtime Limits

This item defined shift manning requirements for normal operation. In addition, a letter dated July 31, 1980 from D. G. Eisenhut to all power reactor licensees and applicants set forth the interim criteria for shift staffing and overtime restrictions.

We have reviewed your Administrative Procedure 1.4, "Station Rules of Practice," Revision 4, issued June 8, 1981 which sets forth Cooper's shift manning overtime policy limits for operating personnel. While this procedure does not strictly adhere to the guidelines, it does appear to meet the overall objective of limiting excessive overtime.

Based on our review of the above procedure, we have determined that your actions adequately address the shift manning overtime limit requirements in response to Item I.A.1.3(1).

Item No. I.C.5 - Feedback of Operating Experience

This item requires each licensee to prepare procedures to assure that operating information pertinent to plant safety originating both within and outside the utility organization is continuously supplied to operators and other personnel and is incorporated into training and retraining programs.

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Nebraska Public Power District (NPPD) has revised Administrative Procedure 1.26 to achieve this goal. This procedure incorporates the use of industry-based and NRC operating experience information systems to ensure that feedback of operating experience is occurring as required by this item. Existing procedures specify the review of material originating at CNS. We have reviewed your procedures and find that they meet the published requirements for feedback of operating experience. We, therefore, conclude that your response to Item No. I.C.5 is acceptable.

Item No. I.C.6 - Verify Correct Performance of Operating Activities

This item requires review and revision, if necessary, to licensee procedures to assure that an effective system of verifying the correct performance of operating activities is provided as a means of reducing human errors and improving the quality of normal operations.

NPPD has in-place controls to provide independent verification, although not necessarily one-on-one checks. These controls include procedures governing maintenance, surveillance testing and operations. The licensee has revised Administrative Procedure 1.6, "Personnel and Equipment Safety," to require independent verification for manual valves that have no position indication in the control room. NPPD has recently completed a review of their present operations, maintenance and surveillance testing programs to determine where additional independent verification should be performed. The results of this review indicated that no additional independent verification is required related to these testing programs. We find your committed actions to be in accordance with the published guidance and conclude that your response to Item No. I.C.6 is acceptable.

Based on the results of our reviews described above, TMI Action Plan Item Nos. I.A.1.3(1), I.C.5, and I.C.6 are considered resolved.

Sincerely,

ORIGINAL SIGNED BY

Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

cc: See next page

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Mr. J. M. Pilant
Nebraska Public Power District

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