

# Nebraska Public Power District

COOPER NUCLEAR STATION  
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October 24, 1990

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

SUBJECT: NPPD Response to Inspection Report 50-298/90-30  
Cooper Nuclear Station  
Docket No. 50-289

Gentlemen:

This letter is written in response to your letter dated September 27, 1990, transmitting Inspection Report 50-298/90-30. Therein, you indicated that one of our activities was in violation of NRC requirements.

Following is a statement of the violation and our response:

### Statement of Violation

Technical Specification 6.3.7c states, "A program shall be established to obtain and analyze . . . samples under accident conditions. This program shall include training of personnel, . . . and provisions for operability of sampling and analysis equipment." Training Program Descriptions (TPD)-0411 and TPD-0412 require that all chemistry technicians be trained and requalified semiannually.

Contrary to the above, the inspectors determined on August 30, 1990, that PASS operator requalification training had not been conducted for all Chemistry Technicians and completed routinely within the time period of every 6 months plus 25 percent during the time period October 1988 through August 1990.

This is a Severity Level IV violation. (Supplement I) (298/9030-01)

### Reason for Violation

The violation occurred due to the failure to document the lapsed requalification training and the circumstances surrounding the lapsed training. The Chemistry Supervisor and Plant Chemist were aware that PASS operator requalification training had lapsed for four of the CNS Chemistry Technicians. The plant was in a refueling outage at the time. Due to the extra workload and the fact that other Chemistry Technicians had completed the requalification training, it was decided to postpone the requalification training until after completion of the outage.

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Corrective Steps Which Have Been Taken And The Results Achieved

As of July 2, 1990, all Chemistry Technicians have been fully qualified to TPD 0411 and TPD 0412. It should also be noted that during the time frame of October 1988 through August 1990, qualified technicians were available to obtain and analyze samples under accident conditions as required by Technical Specification 6.3.7c. As stated in the violation, not all the Chemistry Technicians were qualified to obtain and analyze samples under accident conditions, however, it is felt an adequate number of qualified Chemistry Technicians were available to perform this task should the need have arisen.

Corrective Steps Which Will Be Taken To Avoid Further Violations

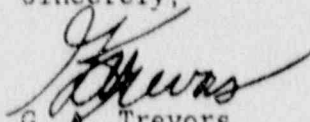
Station procedures will be revised to require documentation of all lapsed craft job specific requalification training and the circumstances surrounding the lapsed training. This documentation will be approved by the cognizant station departmental manager and forwarded to the Training Manager for inclusion into training records.

Date When Full Compliance Will Be Achieved

All Chemistry Technicians are presently qualified to obtain and analyze samples under accident conditions, thus, Cooper Station is in full compliance. Station procedure revisions requiring additional documentation, as discussed above, will be approved by December 1, 1990.

Please contact me if you have any questions or require any additional information.

Sincerely,



G. A. Trevors  
Senior Staff Advisor

GAT:RJM:mc

cc: Regional Administrator  
US NRC - Region IV

NRC Resident Inspector  
Cooper Nuclear Station