

AUG 16 1990

In Reply Refer To:
Docket: 50-298

Nebraska Public Power District
ATTN: D. A. Whitman, Division Manager
Nuclear Support
P.O. Box 499
Columbus, Nebraska 68602-0499

Gentlemen:

This refers to the management meeting held at the Region IV's office on July 20, 1990. This meeting was held at your request to discuss recent changes made to your emergency action levels and the impact of these changes on the effectiveness of your emergency plan.

The subjects discussed during this meeting are summarized in the enclosed meeting summary. During the meeting, you committed to submit a revision to five emergency action level initiating events for NRC review by October 12, 1990. In addition, you committed to send a notice to emergency response decisionmakers in your organization to clarify in advance the changes that will be reflected in the revision.

In accordance with Section 2.790 of NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

T. P. Gwynn for

Samuel J. Collins, Director
Division of Reactor Projects

Enclosures:

1. Management Meeting Summary
2. Attendance List

cc:

Nebraska Public Power District
ATTN: G. D. Watson, General Counsel
P.O. Box 499
Columbus, Nebraska 68602-0499

*RIV:SEPS
DBSpitzberg/ch
/ /90

*C:SEPS
DAPowers
/ /90

D:DRSS
ABBeach
8/14/90

D:DRP
for SJCollins
8/15/90

*Previously concurred

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Cooper Nuclear Station
ATTN: Guy R. Horn, Nuclear
Power Group Manager
P.O. Box 98
Brownville, Nebraska 68321

Cooper Nuclear Station
ATTN: John M. Meacham, Division
Manager, Nuclear Operations
P.O. Box 98
Brownville, Nebraska 68321

Nebraska Department of Environmental
Control
ATTN: Dennis Grams, Director
P.O. Box 98922
Lincoln, Nebraska 68509-8922

Nemaha County Board of Commissioners
ATTN: Larry Bohiken, Chairman
Nemaha County Courthouse
1824 N Street
Auburn, Nebraska 68305

Department of Health
Division of Radiological Health
ATTN: Harold Borchart, Director
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509-5007

Kansas Radiation Control Program Director

U.S. Nuclear Regulatory Commission
ATTN: Senior Resident Inspector
P.O. Box 218
Brownville, Nebraska 68321

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Program Manager
FEMA Region 7
911 Walnut Street, Room 200
Kansas City, Missouri 64106

Nebraska Public Power District

-3-

Director
Nebraska Civil Defense Agency
1300 Military Road
Lincoln, Nebraska 68508

bcc to DMB (IE35)

bcc distrib. by RIV:

R. D. Martin	Resident Inspector
Section Chief (DRP/C)	Lisa Shea, RM/ALF
DRSS-FRPS	MIS System
RIV File	Project Engineer (DRP/C)
RSTS Operator	DRP
P. O'Connor, NRR Project Manager (MS: 11-D-23)	
DRS	ABBeach
DAPowers	DBSpitzberg
GFSanborn	JLieberman, OE
WLBrown	

Management Meeting Summary

Licensee: Nebraska Public Power District

Docket: 50-298

On July 20, 1990, licensee management met with representatives of the NRC staff to discuss Emergency Action Level (EAL) changes made to the Emergency Plan in August 1989. These changes were implemented without NRC approval because in accordance with 10 CFR 50.54(q), the licensee determined that the changes did not decrease the effectiveness of the Plan. After review of the changes by the NRC staff, questions were raised with respect to the EAL changes and a request for additional information was sent to the licensee on March 16, 1990.

The licensee responded to the request for additional information by letter dated May 1, 1990. Region IV received NRC headquarters evaluation of the impact of the changes, and the licensee information justifying these changes, by memorandum dated June 19, 1990. The NRC staff position was that five of the changed EALs represented a lowering of the threshold for classifying certain emergencies and therefore decreased the effectiveness of the Plan in this area.

During the meeting the licensee expressed the reasons behind the changes as an effort to clarify for decisionmakers the initiating events, and to bring some of the events into conformance with technical specifications. The licensee stated that it was never their intent to lower classification thresholds and that their reading of the changes was different than the NRC staff's.

The NRC staff reviewed the five EALs in question and highlighted the specific wording that represented a significant departure from the previous EALs and from NRC guidance as contained in NUREG 0654. The licensee committed to revise the five EALs to conform with the NRC position by October 12, 1990, and to provide the revisions to NRC for review. The specific EALs to be revised are 3.2.3; 5.2.1; 3.3.3; 5.3.1; and 5.3.2. In addition to the revision, the licensee committed to provide written interim guidance to emergency decisionmakers regarding the EALs and the NRC positions discussed during the meeting.

NPPD Management Meeting Attendance List

Nebraska Public Power District

G. R. Horn, Nuclear Power Group Manager
J. M. Meacham, Division Manager, Nuclear Operations
D. A. Whitman, Division Manager, Nuclear Support
V. W. Stairs, Assistant Operations Manager
K. M. Krumland, Emergency Preparedness Supervisor

NRC

A. B. Beach, Director, Division of Radiation Safety and Safeguards
S. J. Collins, Director, Division of Reactor Projects
D. A. Powers, Chief, Security and Emergency Preparedness Section
J. L. Pellet, Chief, Operator Licensing Section
R. D. Lanksbury, Acting Chief, Project Section C
P. W. O'Conner, Senior Project Manager, NRR
D. B. Spitzberg, Emergency Preparedness Analyst
N. M. Terc, Emergency Preparedness Analyst
F. W. Hasselberg, Emergency Preparedness Specialist, NRR
L. A. Yandell, Deputy Director, Division of Radiation Safety and Safeguards
K. M. Kennedy, Operator Licensing Examiner