

APPENDIX A

NOTICE OF VIOLATION

Nebraska Public Power District
Cooper Nuclear Station

Docket: 50-298
License: DPR-46

During an NRC inspection conducted on November 8 through December 30, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above, Maintenance Procedure 7.3.1 was not appropriate to the circumstances in that the procedure did not identify which set of contacts the electricians were to test and reset. Relay DG-REL-DG1(59) spare contacts were adjusted on April 9, 1993, resulting in the live contacts being found out of tolerance on November 8, 1993. The live contacts for Relay DG-REL-DG2(59) were out also found out of tolerance on November 8, 1993. (01014)

Contrary to the above, Maintenance Procedure 7.3.1 was not appropriate to the circumstances in that it did not specify the frequency of testing of the relays in accordance with the manufacturer's recommendation and no justification for the exclusion was provided. (01024)

Contrary to the above, on March 27, 1993 (EDG 2), and April 9, 1993 (EDG 1), both Relays DG-REL-DG2(59) and DG-REL-DG1(59) had their setpoints adjusted, and this activity affecting quality was not accomplished in accordance with Maintenance Procedure 7.3.1, Step 8.2.5, which stated, "If AS-FOUND values were not within tolerance, make necessary adjustments per manufacturer's instruction manual, retest relay and record AS-LEFT data." The licensee did not perform the manufacturer's instruction manual recommended measurements of the contact wipe. (01034)

This is a Severity Level IV violation (Supplement 1) (298/9328-02).

- B. 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," states, in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Contrary to the above, the licensee did not identify the cause and did not take corrective action to preclude repetition for out-of-tolerance

conditions identified in March and April 1993 for Relays DG-REL-DG2(59) and DG-REL-DG1(59). On November 8, 1993, Relays DG-REL-DG2(59) and DG-REL-DG1(59) were again found out of tolerance. (02014)

Contrary to the above, on November 8, 1993, the licensee's corrective actions taken to identify, clarify, and train personnel on the recognition and classification of conditions involving the inoperability of both EDGs did not preclude a repetition of the untimely classification of both emergency diesel generators being inoperable as an Unusual Event. NRC Inspection Report 50-298/91-27 identified, on July 30, 1991, that with both EDGs inoperable, an Unusual Event had not been declared. During an emergency preparedness walkthrough inspection conducted January 1992, a weakness was identified in the area of emergency classification, in part, because a shift supervisor did not recognize that a loss of both onsite EDGs satisfied the emergency action level for an NOUE. (02014)

This is a Severity Level IV violation (Supplement I) (298/9328-04).

Pursuant to the provisions of 10 CFR 2.201, Nebraska Public Power District is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this *15th* day of *March* 1994

NEBRASKA PUBLIC POWER DISTRICT
NUCLEAR REGULATORY COMMISSION -- REGION IV

ENFORCEMENT CONFERENCE

NRC INSPECTION REPORT 50-298/93-28 (JANUARY 6, 1994)

JANUARY 31, 1994



AGENDA

INTRODUCTIONS

G. HORN

OVERVIEW

G. HORN

**ENFORCEMENT ISSUES –
DISCUSSION OF APPARENT VIOLATIONS**

**K. WALDEN
R. GARDNER**

CLOSING REMARKS

G. HORN



OVERVIEW

PRESENTATION ADDRESSES THE FIVE APPARENT VIOLATIONS IDENTIFIED IN THE NRC INSPECTION REPORT DATED JANUARY 6, 1994

THE ISSUES CONCERNING RELAY TESTING AND EDG OPERABILITY WERE SELF-IDENTIFIED – THIS INCLUDED:

- PROBLEM IDENTIFICATION
- INVESTIGATION OF ISSUES

IN OUR VIEW, THE CNS CORRECTIVE ACTION PROGRAM FUNCTIONED SUFFICIENTLY TO IDENTIFY THE RELAY TESTING DEFICIENCIES – BUT FOLLOWUP MONITORING OF THE RELAYS COULD HAVE BEEN MORE AGGRESSIVE

PERFORMANCE OF THE CAP WAS CONSISTENT WITH THE CHALLENGES WE ACCEPTED IN UPGRADING OUR CORRECTIVE ACTION PHILOSOPHY (AS OUTLINED IN OUR NOVEMBER 12, 1993 LETTER TO NRC) – AND WE ARE CONTINUING TO ADJUST THE CAP AS NECESSARY



OVERVIEW (CONT'D)

I WOULD HAVE PREFERRED THAT CAPOG HAD IDENTIFIED THE INADEQUACIES RELATED TO THE INITIAL ROOT CAUSE DETERMINATION AND THE TIMELINESS OF COMMITMENT IMPLEMENTATION RELATED TO SP 6.3.12.

- IT SHOULD BE REALIZED, HOWEVER, THAT AT THE TIME OF THE EVENT, THE ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION APPEARED TO BE SOUND -- FOLLOWUP TESTING WAS SPECIFIED, BUT WAS WEAK

THE APPARENT VIOLATIONS CAN BE GROUPED INTO 3 CATEGORIES:

EDG DESIGN BASIS ISSUES

PROCEDURE AND VENDOR MANUAL ISSUES

TIMING OF DECLARATION OF UNUSUAL EVENT



OVERVIEW (CONT'D)

WITH RESPECT TO EDG DESIGN BASIS ISSUE:

THE NRC POSITION IS NOT CONSISTENT WITH CNS LICENSING BASIS – THE LICENSING BASIS IS CONCURRENT LOOP-LOCA

ACCORDINGLY, ALTHOUGH THE EDGs WERE DECLARED INOPERABLE AS A RESULT OF EDG MONTHLY SURVEILLANCE TESTING ON NOVEMBER 8, 1993, WE DO NOT AGREE THAT THEY WERE "POTENTIALLY INOPERABLE FOR AN EXTENDED PERIOD OF TIME"



OVERVIEW (CONT'D)

WITH RESPECT TO PROCEDURAL/VENDOR MANUAL ISSUES AND THE TIMING OF DECLARATION OF UNUSUAL EVENT ISSUE:

WE MAY DISAGREE WITH ASPECTS OF THE VIOLATIONS, HOWEVER, WE FULLY ACKNOWLEDGE THE SERIOUSNESS OF THE DEFICIENCIES THAT WERE FOUND – IN ADDITION, WE HAVE IDENTIFIED OTHER CONCERNS – ALL OF WHICH WE ARE CORRECTING



OVERVIEW (CONT'D)

TO REFLECT FURTHER INVESTIGATIONS OF THE ISSUES, WE WILL ISSUE A SUPPLEMENT TO LER 93-035 (DECEMBER 8, 1993) –

(1) SOME AREAS OF UNCERTAINTY HAVE BEEN RESOLVED AS A RESULT OF FURTHER EVALUATION AS NOTED IN THE LER (E.G., EDG DESIGN BASIS);

(2) SUBSEQUENT ROOT CAUSE INVESTIGATIONS HAVE PROVIDED ADDITIONAL INSIGHT (E.G., RELAY ADJUSTMENT, CONTACT WIPE, VENDOR MANUALS)

CNS TAKES THE ISSUES BEING DISCUSSED TODAY VERY SERIOUSLY

ALTHOUGH WE MAY DISAGREE WITH SOME OF THE SPECIFICS OF THE APPARENT VIOLATIONS, WE HAVE STILL MADE IMPROVEMENTS IN THESE AREAS



ENFORCEMENT ISSUES

DISCUSSION OF APPARENT VIOLATIONS



APPARENT VIOLATION 9328-01

DESCRIPTION:

THE AS-FOUND CONDITIONS OF EMERGENCY DIESEL RELAYS DG-REL-DG1(59) AND -DG2(59) WOULD HAVE PREVENTED THE EMERGENCY DIESELS 1 AND 2 FROM PERFORMING THEIR INTENDED DESIGN FUNCTION FOR ACCIDENT SCENARIOS WHERE OFFSITE POWER IS AVAILABLE, AND THEN SUBSEQUENTLY LOST. THIS IS AN APPARENT VIOLATION OF TECHNICAL SPECIFICATIONS 3.9.A AND 3.5.F (REQUIRES EDG OPERABILITY).

NPPD POSITION: DISAGREE WITH THE APPARENT VIOLATION

BASIS FOR POSITION:

NRC POSITION IS INCONSISTENT WITH COOPER LICENSING BASIS

DESIGN BASIS LOCA DEFINED AS SIMULTANEOUS LOOP/LOCA



APPARENT VIOLATION 9328-01 (CONT'D)

OPERABILITY:

TECHNICAL SPECIFICATION DEFINITION OF OPERABLE/OPERABILITY STATES:

"...WHEN IT IS CAPABLE OF PERFORMING ITS SPECIFIED FUNCTION(S)."

SPECIFIED FUNCTIONS:

THE SPECIFIED FUNCTION(S) OF THE SYSTEM IS THAT SPECIFIED SAFETY FUNCTION(S) IN THE CURRENT LICENSING BASIS FOR THE FACILITY. (NRC GENERIC LETTER 91-18)

IT IS THE DISTRICT'S POSITION THAT NOT ALL "DESCRIPTIVE" INFORMATION IN THE USAR CONSTITUTES "SPECIFIED FUNCTIONS" NECESSARY TO SATISFY THE T.S. OPERABILITY REQUIREMENTS



APPARENT VIOLATION 9328-01 (CONT'D)

SAFETY OBJECTIVE:

"A SAFETY OBJECTIVE DESCRIBES IN FUNCTIONAL TERMS THE PURPOSE OF A SYSTEM OR COMPONENT AS IT RELATES TO CONDITIONS CONSIDERED TO BE OF PRIMARY SIGNIFICANCE TO THE PROTECTION OF THE PUBLIC..." USAR CHAP. I

SAFETY DESIGN BASIS:

"THE SAFETY DESIGN BASIS FOR A SAFETY SYSTEM STATES IN FUNCTIONAL TERMS THE UNIQUE DESIGN REQUIREMENTS WHICH ESTABLISH THE LIMITS WITHIN WHICH THE SAFETY OBJECTIVE SHALL BE MET..." USAR CHAP. I



APPARENT VIOLATION 9328-01 (CONT'D)

IS THE DELAYED LOOP A SPECIFIED FUNCTION?

SAFETY OBJECTIVE USAR, CHAPTER VIII, SECTION 5, STANDBY A-C POWER

"TO PROVIDE A SINGLE FAILURE PROOF SOURCE OF ON-SITE AC POWER ADEQUATE FOR THE SAFE SHUTDOWN OF THE REACTOR FOLLOWING ABNORMAL TRANSIENTS AND POSTULATED ACCIDENTS."

SAFETY DESIGN BASIS USAR, CHAPTER VIII, SECTION 5, STANDBY A-C POWER

11 SAFETY DESIGN BASIS (SDB) REQUIREMENTS AGAINST WHICH IS JUDGED THE ACCEPTABILITY OF THE DESIGN

SDB #5 STATES: "THE GENERATOR SETS SHALL HAVE THE ABILITY TO PICK UP LOADS AS DESCRIBED IN TABLE VIII-5-1 IN A SEQUENCE AND TIME PERIOD TO SATISFY DESIGN BASIS LOSS-OF-COOLANT ACCIDENT ACCEPTANCE CRITERIA ASSUMING A LOSS OF NORMAL AUXILIARY POWER."



APPARENT VIOLATION 9328-01 (CONT'D)

IS THE DELAYED LOOP A SPECIFIED FUNCTION?

SAFETY DESIGN BASIS USAR CHAPTER VII, SECTION 4, CORE STANDBY COOLING SYSTEMS CONTROL AND INSTRUMENTATION, 4.2.5.c

"THE POWER SUPPLIES FOR THE CONTROLS AND INSTRUMENTATION FOR THE CORE STANDBY COOLING SYSTEMS SHALL BE CHOSEN SO THAT CORE COOLING CAN BE ACCOMPLISHED CONCURRENTLY WITH A LOSS OF OFF-SITE A-C POWER."

CHAPTER XIV, SECTION 6, ANALYSIS OF DESIGN BASIS ACCIDENTS, SECTION 6.3.1.b, IDENTIFIES THE FOLLOWING INITIAL CONDITION/ASSUMPTION:

"A COMPLETE LOSS OF NORMAL A-C POWER OCCURS SIMULTANEOUSLY WITH THE PIPE BREAK."



APPARENT VIOLATION 9328-01 (CONT'D)

NRC ACCEPTANCE OF COINCIDENT LOCA/LOOP

SUBMITTAL OF ORIGINAL FSAR IN 1971

DESCRIBED VIRTUALLY IDENTICAL SAFETY OBJECTIVES, SAFETY DESIGN BASIS, INITIAL CONDITIONS AND ASSUMPTIONS FOR DESIGN BASIS LOCA

ACCEPTED BY STAFF AND LICENSE GRANTED

SER STATED "A LOSS OF OFFSITE POWER WILL NOT PREVENT ECCS OPERATION AND ALL EVALUATIONS ARE MADE ASSUMING THAT ONLY ONSITE ELECTRICAL POWER IS AVAILABLE.", AND WITH REGARD TO SINGLE FAILURES, "THIS SINGLE FAILURE CRITERION HAS BEEN APPLIED COINCIDENT WITH THE ASSUMED LOSS OF OFFSITE POWER."



APPARENT VIOLATION 9328-01 (CONT'D)

NRC ACCEPTANCE OF COINCIDENT LOCA/LOOP

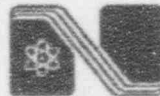
NPPD PROPOSED AMENDMENT FOR INITIAL REFUELING

GENERAL ELECTRIC NEDO-21337, "COOPER NUCLEAR STATION EMERGENCY CORE COOLING SYSTEM LOW PRESSURE COOLANT INJECTION MODIFICATION FOR PERFORMANCE IMPROVEMENT", JULY 1976.

IDENTIFIES COINCIDENT LOCA/LOOP AS DESIGN BASIS

"A COMPLETE LOSS OF NORMAL AC POWER OCCURS SIMULTANEOUSLY WITH THE LOCA. THIS ADDITIONAL CONDITION RESULTS IN THE LONGEST DELAY TIME FOR THE CORE STANDBY COOLING SYSTEMS TO BECOME OPERATIONAL."

APPROVED AND ISSUED AS LICENSE AMENDMENT 31, SEPTEMBER 28, 1976



APPARENT VIOLATION 9328-01 (CONT'D)

NRC ACCEPTANCE OF COINCIDENT LOCA/LOOP

COMPLIANCE WITH 10CFR50.46

ANALYSIS PERFORMED BY GENERAL ELECTRIC USING APPROVED
METHODOLOGY, IDENTIFIES COINCIDENT LOCA/LOOP AS DESIGN BASIS.

ACCEPTED BY NRC IN AMENDMENT 39

COMPLIANCE WITH STAFF GUIDANCE REGARDING SECOND LEVEL
UNDervOLTAGE

NPPD 10CFR 50.92 REITERATES COINCIDENT LOCA/LOOP AS DESIGN BASIS

APPROVED AND ISSUED AS LICENSE AMENDMENT 95, NOVEMBER 21, 1985



APPARENT VIOLATION 9328-01 (CONT'D)

USAR CHAPTER VIII SECTION 5.3, DESCRIPTION

SECTION 5.3.1 "SYSTEM OPERATION" PROVIDES DESCRIPTIVE PASSAGE RELATIVE TO FIGURE VIII-5-1, AUXILIARY ONE LINE DIAGRAM (DEPICTS 4160 VAC BREAKERS SUPPLYING CRITICAL BUSES)

DESCRIPTION OF HOW THE PREFERRED POWER SOURCE BREAKER LOGIC ACTS

DOES NOT DESCRIBE REQUIREMENTS

DOES NOT DESCRIBE A "DELAYED LOOP" EVENT

DESCRIBES WHAT OCCURS IF OFF-SITE POWER IS AVAILABLE OR IF OFF-SITE POWER IS NOT AVAILABLE

DESCRIBES COMPLIANCE WITH USAR CHAPTER VIII, SECTION 5, SDB #11, REGARDING CONFORMANCE TO IEEE-308, SECTION 5.2.4.2, FUNCTION

"THE STANDBY POWER SUPPLY SHALL PROVIDE ELECTRIC ENERGY FOR THE OPERATION OF EMERGENCY SYSTEMS AND ENGINEERED SAFETY FEATURES DURING AND FOLLOWING THE SHUTDOWN OF THE REACTOR WHEN THE PREFERRED POWER SUPPLY IS NOT AVAILABLE."



APPARENT VIOLATION 9328-01 (CONT'D)

SUMMARY:

NRC APPEARS TO HAVE VIEWED SECTION 5.3.1 WITHOUT CONSIDERING THE BALANCE OF INFORMATION AVAILABLE IN THE USAR.

SPECIFIED FUNCTION CANNOT BE DERIVED FROM DESCRIPTIVE MATERIAL

SOME CONFUSION EXISTED AS TO REASON FOR EDG START ON LOCA SIGNAL

SPECIFIED FUNCTION IS PROPERLY DERIVED FROM SDB AND OTHER LICENSING CORRESPONDENCE

DURING THE PERIOD ADDRESSED IN THE INSPECTION REPORT, MARCH - NOVEMBER, 1993, THE EDGs WERE CAPABLE OF PERFORMING THEIR SPECIFIED SAFETY FUNCTION IN THE EVENT OF A DESIGN BASIS, CONCURRENT LOOP-LOCA EVENT.

TO CHANGE INTERPRETATION AFTER 20 YEARS WOULD CONSTITUTE A NEW POSITION BY NRC REGARDING THE CNS LICENSING BASIS.



APPARENT VIOLATION 9328-02 (EXAMPLE 1)

DESCRIPTION:

INADEQUATE PROCEDURE – MP 7.3.1 WAS NOT APPROPRIATE TO THE CIRCUMSTANCES, IN THAT THE PROCEDURE DID NOT IDENTIFY WHICH SET OF CONTACTS THE ELECTRICIANS WERE TO TEST AND RESET

THE INADEQUATE PROCEDURE RESULTED IN RELAY MISADJUSTMENT WHICH REPRESENTED A COMMON MODE FAILURE MECHANISM FOR BOTH DIESELS

BASIS:

CRITERION V, "INSTRUCTIONS, PROCEDURES, AND DRAWINGS"

NPPD POSITION:

AGREE THAT THE FAILURE TO IDENTIFY WHICH SET OF CONTACTS THE ELECTRICIANS WERE TO TEST AND RESET, RESULTED IN UNCERTAINTY REGARDING ADJUSTMENTS TO THE "59" RELAYS

HOWEVER, IT IS NOT CLEAR THAT RELAY MISADJUSTMENT RESULTED IN A COMMON MODE FAILURE CONDITION FOR THE EDGS



APPARENT VIOLATION 9328-02 (EXAMPLE 1) (CONT'D)

SIGNIFICANCE:

THE DESIGN BASIS FOR CNS IS SIMULTANEOUS LOOP/LOCA

A COMMON MODE FAILURE DID NOT EXIST: DG SEQUENTIAL LOADING TEST (SP 6.3.4.3) WAS PERFORMED AT THE END OF THE OUTAGE TO ENSURE WORK PERFORMED ON ALL SYSTEMS ASSOCIATED WITH SEQUENTIAL LOADING WAS ACCEPTABLE

PROCEDURES ADDRESS THE POTENTIAL NEED FOR OPERATOR ACTION WHERE EXPECTED AUTOMATIC ACTIONS DO NOT OCCUR



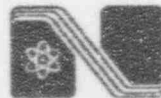
APPARENT VIOLATION 9328-02 (EXAMPLE 1) (CONT'D)

CAUSES:

MP 7.3.1 DID NOT PROVIDE SUFFICIENT SPECIALIZED GUIDANCE FOR "59" RELAYS TESTING AND SETTING

INADEQUATE FEEDBACK FROM ELECTRICIANS CONCERNING MP 7.3.1 PROCEDURAL AMBIGUITIES (SUCH AS LACK OF FILL-IN BLANKS FOR BOTH "LIVE" AND SPARE CONTACTS)

- FAILURE TO STOP WORK WHEN THE AMBIGUITIES WERE ENCOUNTERED



APPARENT VIOLATION 9328-02 (EXAMPLE 2)

DESCRIPTION:

INADEQUATE PROCEDURE – MP 7.3.1 NOT APPROPRIATE TO THE CIRCUMSTANCES IN THAT IT DID NOT SPECIFY THE FREQUENCY OF TESTING OF THE RELAYS IN ACCORDANCE WITH THE MANUFACTURER'S RECOMMENDATIONS AND NO JUSTIFICATION WAS PROVIDED

BASIS:

CRITERION V, "INSTRUCTIONS, PROCEDURES, AND DRAWINGS"

NPPD POSITION:

AGREE THAT JUSTIFICATION WAS NOT PROVIDED FOR THE EXCEPTION TO THE VENDOR RECOMMENDATION FOR TESTING FREQUENCY



APPARENT VIOLATION 9328-02 (EXAMPLE 2) (CONT'D)

SIGNIFICANCE:

LOW SAFETY SIGNIFICANCE BECAUSE HISTORY HAS DEMONSTRATED THE ACCEPTABILITY OF PERFORMING MP 7.3.1 AT AN EXTENDED FREQUENCY:

MP 7.3.1 PURPOSE WAS TO DETERMINE THE AS-FOUND CONDITION OF THE "59" RELAYS AND ADJUST TO WITHIN TOLERANCE, IF APPROPRIATE

HISTORY OF "59" RELAYS PROVIDES GOOD INDICATION THAT PRESENT FREQUENCY OF PERFORMANCE OF MP 7.3.1 WAS SUFFICIENT

CAUSE:

MISINTERPRETATION OF RECOMMENDATIONS IN THE VENDOR MANUAL



APPARENT VIOLATION 9328-02 (EXAMPLE 2) (CONT'D)

CORRECTIVE ACTIONS:

SHORT TERM: PERFORMING TESTING AT VENDOR RECOMMENDED FREQUENCY UNTIL DOCUMENTED BASIS FOR AN EXTENDED FREQUENCY IS ESTABLISHED

LONG TERM: REVIEWING VENDOR MANUALS FOR SAFETY-RELATED PROTECTIVE RELAYS IDENTIFIED IN MP 7.3.1 TO VERIFY ADEQUACY OF TESTING FREQUENCY



APPARENT VIOLATION 9328-03

DESCRIPTION:

ON MARCH 27 (DG2) AND APRIL 9 (DG1), 1993, THE LICENSEE FAILED TO FOLLOW MP 7.3.1, IN THAT, THE MANUFACTURER'S RECOMMENDED MEASUREMENTS OF THE CONTACT WIPE WERE NOT PERFORMED

BASIS:

CRITERION V, "INSTRUCTIONS, PROCEDURES, AND DRAWINGS"

NPPD POSITION:

AGREE



APPARENT VIOLATION 9328-03 (CONT'D)

SIGNIFICANCE:

RELIABILITY OF THE CONTACTS COULD HAVE BEEN AFFECTED

HISTORICALLY, FAILURE TO ADJUST WIPE HAS NOT RESULTED IN AN EDG FAILURE

CAUSE:

FAILURE TO STRICTLY ADHERE TO THE VENDOR MANUAL INSTRUCTIONS BECAUSE
VENDOR MANUAL GUIDANCE WAS NOT EASILY UNDERSTOOD



APPARENT VIOLATION 9328-03 (CONT'D)

CORRECTIVE ACTIONS:

**SHORT TERM: DOCUMENT BASIS FOR EXCEPTIONS TO VENDOR
RECOMMENDATIONS**

LONG TERM: PREPARING A NEW PROCEDURE FOR "59" RELAYS

**REVIEWING VENDOR MANUALS FOR SAFETY-RELATED
PROTECTIVE RELAYS IDENTIFIED IN MP 7.3.1 TO VERIFY
ADEQUACY OF MAINTENANCE**



APPARENT VIOLATION 9328-04

DESCRIPTION:

THE LICENSEE DID NOT EFFECTIVELY IDENTIFY OR ADDRESS THE RELAY OUT-OF-TOLERANCE CONDITIONS IDENTIFIED IN MARCH AND APRIL 1993, AND THE CORRECTIVE ACTIONS TAKEN DID NOT PRECLUDE REPETITION

BASIS:

CRITERION XVI, "CORRECTIVE ACTION"

NPPD POSITION:

AGREE

CAUSE:

WITH AVAILABLE INFORMATION AT THE TIME – INCLUDING THE HISTORY OF THE "59" RELAYS AS WELL AS THEIR AGE, IT WAS REASONABLE THAT THE ENGINEERING RESPONSE TO NCR 93-048 ATTRIBUTED THE CAUSE OF THE AS FOUND CONDITION TO "DRIFT"



APPARENT VIOLATION 9328-04 (CONT'D)

SIGNIFICANCE:

UNTIL MARCH, 1993 NO SIMILAR VOLTAGE SETPOINT OUT OF TOLERANCES OF THE "59" RELAYS HAD BEEN OBSERVED

APPROPRIATELY: NCR 93-048 GENERATED FROM DR 93-116 WHICH WAS WRITTEN BY ELECTRICIAN ON MARCH 27, 1993, TO ADDRESS THE APPARENT AS-FOUND OUT OF TOLERANCE CONDITION

THE INFORMATION AVAILABLE AT THE TIME DID NOT SUGGEST THAT THE ROOT CAUSE DETERMINATION WAS INADEQUATE

THE TRUE PROBLEM WAS RELAY TESTING INADEQUACY, WHICH WAS NOT IDENTIFIED UNTIL NOVEMBER 8 DG OPERABILITY TESTING (WITH CONTINUITY VERIFICATION)



APPARENT VIOLATION 9328-04 (CONT'D)

CORRECTIVE ACTIONS:

SHORT TERM: DISCUSSIONS WITH ELECTRICAL SHOP BY SENIOR MANAGEMENT EMPHASIZED THE NEED TO PROPERLY CHARACTERIZE THE DISCREPANCY INPUTTED INTO THE CAP.

LONG TERM: PERSONNEL TRAINING FOR THE NEW CAP WILL STRESS THE IMPORTANCE OF PROPER CHARACTERIZATION OF PROBLEMS FOR ENTRY INTO THE CAP.



APPARENT VIOLATION 9328-05

DESCRIPTION:

ON NOVEMBER 8, 1993, CORRECTIVE ACTIONS TAKEN TO IDENTIFY, CLARIFY, AND TRAIN ON THE RECOGNITION AND CLASSIFICATION OF CONDITIONS INVOLVING THE INOPERABILITY OF BOTH EDGS DID NOT PRECLUDE A REPETITION OF PRIOR FAILURES TO CLASSIFY THESE CONDITIONS AS AN UNUSUAL EVENT

BASIS:

CRITERION XVI, "CORRECTIVE ACTION"

NPPD POSITION:

AGREE WITH INAPPROPRIATE TIMELINESS IN DECLARING THIS EVENT

CAUSE:

CORRECTIVE ACTION FOR PREVIOUS EVENTS, ALTHOUGH IMPLEMENTED, WAS INADEQUATE TO PREVENT PERSONNEL FROM FAILING TO IDENTIFY AND DECLARE AN UNUSUAL EVENT



APPARENT VIOLATION 9328-05 (CONT'D)

SIGNIFICANCE:

MINIMAL SAFETY SIGNIFICANCE FOR THIS EVENT- MANAGERIAL OVERSIGHT ENSURED CORRECT CLASSIFICATION OF THE EVENT - NOTIFICATIONS WERE TIMELY

PREVIOUS CORRECTIVE ACTIONS FOR UI 9127-02 AND WEAKNESS 92-01-01

IMMEDIATE RETRAINING AND REEVALUATION ON CLASSIFICATION - WAS GIVEN TO ALL OPERATING CREWS - SCENARIO INVOLVED ONE EDG INOPERABLE, SECOND EDG FAILS A SURVEILLANCE AND IS DECLARED INOPERABLE

EAL CLASSROOM AND DYNAMIC SIMULATOR EMERGENCY RESPONSE TRAINING WERE ENHANCED FOR REQUAL TRAINING TO PERIODICALLY TRAIN ON CLASSIFICATION FOR A VARIETY OF SCENARIOS INCLUDING THE ABOVE

PROCEDURE 5.7.1 "CLASSIFICATION" - REVISED 6/92 TO SPECIFY THAT "LOSS" EQUATES TO NOT HAVING "OPERABILITY" AS DEFINED IN THE TECH. SPECS. FOR THE EDGs



APPARENT VIOLATION 9328-05 (CONT'D)

SIGNIFICANCE (CONT'D):

NOVEMBER 8, 1993 EVENT

PROCEDURE 5.7.1 INSTRUCTS THE SHIFT SUPERVISOR TO:

- 1) DETERMINE THE EVENT CATEGORY
- 2) USE ATTACHMENT 1 FLOWCHART – TO QUICKLY LOCATE APPROPRIATE EVENT CATEGORY
- 3) REFER TO ATTACHMENT 2 FOR CONFIRMATION

SHIFT SUPERVISOR AND STA PERFORMED STEPS 1 AND 2, BUT DID NOT PERFORM STEP 3

ATTACHMENT 2 PROVIDED ADDITIONAL INFORMATION THAT WOULD HAVE ENSURED CORRECT CLASSIFICATION – SS AND STA ALSO DID NOT REVIEW INFORMATION IN PROCEDURE BODY DEFINING "LOSS" AS "INOPERABLE"



APPARENT VIOLATION 9328-05 (CONT'D)

CORRECTIVE ACTIONS:

SHORT TERM: SHIFT SUPERVISOR WAS INFORMED BY PLANT MANAGER THAT NOUE CONDITION EXISTED AND WAS DIRECTED TO MAKE THE DECLARATION. ALL SHIFT SUPERVISORS WERE NOTIFIED OF THIS EVENT AND OF THE REQUIREMENTS BY THE PLANT MANAGER AND OTHER CORRESPONDENCE.

PROCEDURE 5.7.1 ATTACHMENT 1 WAS REVISED TO USE THE TERM "INOPERABLE" FOR EAL 4.1.2

LONG TERM: EVENT WILL BE DISCUSSED AT INDUSTRY EVENTS TRAINING USE OF EALs IN CONJUNCTION WITH CORRECT USE OF PROCEDURE 5.7.1 WILL BE EMPHASIZED DURING FUTURE EP TRAINING. THIS TRAINING WILL EMPHASIZE THE NEED TO UTILIZE ALL PROVIDED PROCEDURAL GUIDANCE IN DETERMINING PROPER CLASSIFICATION OF AN EVENT.



CLOSING REMARKS

THE DISTRICT'S POSITION IS THAT THE CNS LICENSING BASIS IS CONCURRENT LOOP-LOCA – THE NRC POSITION WOULD INVOLVE A CHANGE TO THE CNS LICENSING BASIS

THE CNS CORRECTIVE ACTION PROGRAM FUNCTIONED SUFFICIENTLY TO IDENTIFY THE RELAY TESTING DEFICIENCIES – BUT FOLLOWUP MONITORING OF THE RELAYS COULD HAVE BEEN MORE AGGRESSIVE

WE ACKNOWLEDGE THE NOTED DEFICIENCIES INVOLVING VENDOR RECOMMENDATIONS AND DECLARATION OF UNUSUAL EVENTS

IN ADDITION, WE HAVE IDENTIFIED OTHER CONCERNS – ALL OF WHICH WE ARE CORRECTING

