

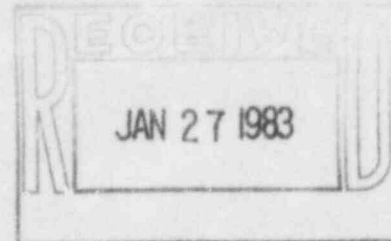
Nebraska Public Power District

GENERAL OFFICE
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LQA8300001

January 21, 1983

Mr. G. L. Madsen, Chief
Reactor Project Branch 1
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011



Subject: NPPD Response to IE Inspection Report No. 50-298/82-30

Dear Mr. Madsen:

This letter is written in response to your letter dated December 8, 1982 transmitting Inspection Report No. 50-298/82-30. You indicated certain of our activities were in violation of NRC requirements as found during an October 18-22, 1982 inspection. We were to respond by January 7, 1983 but requested and was granted a two week extension at our meeting with Mr. Collins and others on January 5, 1983.

Following is the statement of the reported violation and our response in accordance with 10CFR2.201.

Statement of Violation

Failure to Perform Biennial Review of Procedures

Technical Specification 6.2.1.A.4.j requires review of "all procedures required by these Technical Specifications . . . at an interval of not more than 2 years." Technical Specification 6.3.3 requires that maintenance and test procedures will be provided for "Preventive or corrective maintenance of plant equipment and systems that could have an effect on nuclear safety." Licensee Administrative Procedure 1.3.9 states "all procedures will be reviewed for current applicability no less frequently than once every 2 years."

Contrary to the above, the licensee failed to perform biennial reviews of 19 procedures, primarily in the maintenance area, within the required 2 year interval.

Discussion of Violation

We definitely agree that we were in violation with respect to our not meeting the review interval requirements of our procedures. However, we believe we

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were in violation on only eight procedures instead of the 19 listed. The difference results because of two reasons. First, procedure number 7.5.6.3 had been reviewed on 1-8-80 and was again reviewed on 1-6-82. Thus, the review of that procedure had been completed within the strict two year time requirement and should not have been listed.

On ten other procedures, our review had been completed within what we had previously considered as an acceptable review cycle, two years \pm 25%. This interpretation had been arrived at by the definition of surveillance frequency in the Definition portion of our Technical Specification. Although we knew this did not specifically cover procedure review, we considered, if it was acceptable for surveillance tests which is a very important item regarding nuclear safety, it was surely acceptable for a less significant item as procedure review.

We still believe that we need some flexibility in procedure review schedules. We have over 1000 procedures that are in our procedure manual and are to be reviewed every two years. We try to schedule the review of these procedures to distribute the work load over a period of time as well as not to have a large number of procedures requiring review during a scheduled outage. Thus, some flexibility such as \pm 25% is necessary.

To meet the strict interpretation of no less frequently than every two years, it is necessary to either review procedures on an annual basis or do the review on a 22 or 23 month cycle which means a continual changing of review dates which results in scheduling conflicts and administrative inefficiencies. We believe this is not warranted for such an insignificant issue.

We believe the solution to the problem is to request a change in Technical Specifications to specify a biennial review of such procedures pursuant to an administrative procedure and then specify the details of the frequency in the Administrative Procedure. We have been informed by your representative that this may be acceptable as it is an approach used in the Standard Technical Specifications. Our latest Revision #3 uses the words "Each procedure ... shall be reviewed by ... and approved by the Plant Superintendent prior to implementation and reviewed periodically as set forth in administrative procedures."

Correction Steps Which Have Been Taken and the Results Achieved

All of the procedures listed in the notice of violation have now been reviewed. We have also developed a new computer printout to aid in the tracking of procedure review.

Corrective Steps Which Will Be Taken to Avoid Further Violation

We will be requesting a Technical Specification change to use Standard Technical Specification wording as mentioned in the Discussion Section above. If this Technical Specification change is approved, we will then specify the procedure review details in our administrative procedures.

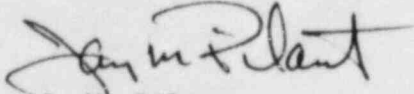
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Date When Full Compliance Will Be Achieved

We are currently in full compliance with respect to review of the listed procedures. Full compliance with respect to the proposed Technical Specification change will depend on NRC approval. The procedure change will be implemented with 30 days of Technical Specification change.

If you have any questions regarding this response, please contact me.

Sincerely,



J. M. Pilant
Division Manager of Licensing
and Quality Assurance

JMP:LCL:cg/sn