

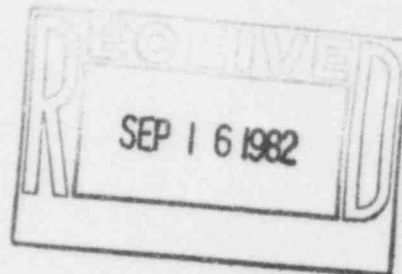


# Nebraska Public Power District

COOPER NUCLEAR STATION  
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321  
TELEPHONE (402) 825-3811

LQA8200021

September 10, 1982



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. 50-298/82-16

Dear Mr. Madsen:

This letter is written in response to your letter dated August 13, 1982, transmitting Inspection Report No. 50-298/82-16. You indicated that certain of our activities were in violation of NRC requirements.

Following are statements of each violation and our response in accordance with 10CFR2.201.

## Statement of Violation

### Failure to Follow Procedures (Two Occurrences)

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions and procedures and shall be accomplished in accordance with these instructions and procedures.

"Cooper Nuclear Station Quality Assurance Program for Operation," Revision 8, dated August 20, 1979, requires that activities having safety significance will be accomplished in accordance with documented instructions and procedures.

- (1) CNS Health Physics Procedure 9.1.1.5, Revision 3, titled "Radiography," Section VI, paragraph A.3, requests the radiographer to post the area in which radiography will be performed. Also, paragraph A.6 requires the CNS Health Physics Technician to inspect the area for compliance prior to commencing radiography.

Contrary to the above, on June 4, 1982, a personnel access path located within 10 feet of an exposed source being used for radiography operations was not posted in any manner.

Corrective Steps Which Have Been Taken and Results Achieved

This incident was discussed with the radiographer and the Health Physics Technician involved. They stated this radiography was performed before normal working hours when a minimum number of people were on site. A tour was made of the 903 and 932 foot elevations of the reactor building to verify personnel were not present. An announcement was then made over the station intercom system stating that radiography would be in progress in the affected area and personnel were to stay clear of the area. An announcement was also made over the plant intercom system when radiography was completed.

The Health Physics Technician and the radiographer were made aware that all entryways into the affected area are to be posted or locked, or shall be otherwise directly observable to the radiographer to prevent entry during radiography activities.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The inspection report and its description of the violation were routed to all the Chemistry and Health Physics department personnel.

The Date When Full Compliance Will Be Achieved

Cooper Nuclear Station is presently in full compliance.

Statement of Violation

Failure to Follow Procedures

- (2) CNS Maintenance Procedure 7.4.4, Revision 12, titled "Reactor Vessel Head Removal and Installation," Section VIII, paragraph 6, states, "A two-pass program will be used in detensioning, all studs will have their load reduced to about 3/4 of their load on the first pass and then the load would be reduced altogether on the second pass . . . ."

Contrary to the above, on May 22, 1982, 48 of 52 reactor vessel head studs were fully detensioned on the first pass.

Corrective Steps Which Have Been Taken and Results Achieved

The corrective steps taken to evaluate and correct the hardware and potential safety concerns were described in our LER 50-298/82-12.

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This occurrence was discussed with the appropriate station maintenance personnel. Disciplinary action has been taken toward the person considered responsible for this procedural error. Interviews have been conducted with a number of maintenance personnel in an effort to determine why such an event occurs and if changes in procedures and/or checklists are needed to prevent such procedural errors.

Although no cause for such a procedural error was obtained, it was determined that reorganization of the procedure and development of a better checklist may prevent a similar error. Inclusion of certain independent QC checks may also prevent recurrence.

Corrective Steps Which Will Be Taken To Avoid Further Violations

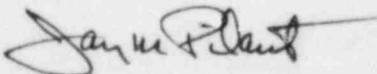
- a. Prior to further detensioning operations, Maintenance Procedure 7.4.4 will be revised to include changes considered necessary for avoiding another procedural error in detensioning.
- b. Other similar procedures will be reviewed to determine if revisions are needed to lessen chances of a procedural error.
- c. The importance of following procedures and pointing out deficiencies in procedures before events occur is being stressed to the appropriate personnel.

The Date When Full Compliance Will Be Achieved

It is considered that we are currently in full compliance in regard to the vessel head. The above corrective action steps will be completed before the next vessel detensioning or no later than March 1, 1983.

If you have any questions in regard to this response, please contact me or L. C. Lessor at the site.

Sincerely,



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

JMP:LCL:cg