



# Nebraska Public Power District

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May 25, 1994

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: NPPD Response to Inspection Report 50-298/94-11

Gentlemen:

This letter is written in response to your letter dated April 22, 1994, transmitting Inspection Report 50-298/94-11. Therein, you identified two (2) weaknesses in our Emergency Preparedness Program observed during the routine inspection of the operational status of the Emergency Preparedness Program. The attachment to this letter contains a description of our corrective measures for the identified weaknesses and our schedule for their completion.

Should you have any questions concerning this matter, please contact me.

Sincerely,

G. E. Horn  
Vice President - Nuclear

GRH/SJJ:ju

Attachment

cc: Regional Administrator  
USNRC - Region IV

NRC Resident Inspector  
Cooper Nuclear Station

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Statement of Weakness (50-298/9411-01)

One of the three crews failed to recognize immediately during the dynamic scenario that the failure of two rods to fully insert after a reactor scram constituted inability to demonstrate that shutdown margin could be maintained for all plant conditions. As a result, this crew transmitted a followup Notification of Unusual Event message to state and local authorities and NRC. Approximately 5 minutes after transmitting the erroneous followup message, the shift supervisor upgraded the event classification to a Site Area Emergency, more than 25 minutes after the conditions requiring the upgrade occurred. Failure to make the proper event classification is an exercise weakness.

Planned Corrective Action

In the past, simulator training scenarios and evaluated dynamic scenarios did not go to the depth of EPIP scenarios. The scenario was typically stopped after the Shift Supervisor had made the initial classification. In order to further broaden and reinforce the required actions necessary to meet the EPIP requirements; future training will include EPIP actions expected to be performed by the crew.

Schedule of Implementation

The revision discussed above will be completed by July 29, 1994.

Statement of Weakness (50-298/9411-02)

During the scenario discussed above, the same crew never activated the Cooper Nuclear Station Pager System. Activation of the pager system is required by Cooper Nuclear Station Operations Manual Emergency Plan Implementing Procedure (EPIP) 5.7.6, "Notification", for Alert or higher classifications to ensure adequate staffing during off-hours events. Since the scenario specified off-hours conditions, failure to activate the pager system could result in failure to activate the Technical Support Center, the Operational Support Center, and the Emergency Operations Facility (required at the Site Area or General Emergency levels) within the allowed 1 hour time. Failure to initiate actions required to ensure minimum staffing is an exercise weakness.

Planned Corrective Action

EIPs 5.7.3 "Alert Implementing Procedure", 5.7.4 "Site Area Emergency Implementing Procedure", and 5.7.5 "General Emergency Implementing Procedure" now have Temporary Procedure Change Notices (approved on April 7, 1994) that require as an immediate action: "Direct the Operations Communicator to call in additional personnel per CNS Policy Directive 10, Pager Call-In Capability." Prior to the revision, the statement read, "Determine the need for additional personnel. Direct the Operations Communicator to call in additional personnel per CNS Policy Directive 10, Pager Call-In Capability." As originally worded, calling in additional personnel was at the discretion of the Emergency Director. This interpretation is less restrictive than EPIP 5.7.6, "Notification", Section 8.1.2, which states, in part:

- 8.1.2.1 For an ALERT or higher classification, or as conditions warrant, the Emergency Director shall direct the Shift Communicator to activate the CNS Pager System per CNS Policy Directive 10. Activation of the Pager System ensures minimum staffing per NUREG 0654/FEMA-REP-1, Table B-1.

The described procedure changes for calling in additional personnel at an ALERT or higher classification will make this a required action by the Emergency Director.

In order to further broaden and reinforce the required actions necessary to meet the EPIP requirements; future training will include EPIP actions expected to be performed by the crew.

Schedule of Implementation

The revision discussed above will be completed by July 29, 1994.