



# Nebraska Public Power District

COOPER NUCLEAR STATION  
P.O. BOX 96, BROWNVILLE, NEBRASKA 68321  
TELEPHONE (402)825-3811  
FAX (402)825-5211

CNSS941202  
May 31, 1994

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

Subject: Reply to a Notice of Violation, Inspection Report 50-298/94-03, Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: Letter from A. B. Beach (NRC) to G. R. Horn (NPPD) dated April 29, 1994, "NRC Inspection Report 50-298/94-03 (Notice of Violation)"

Gentlemen:

The following discussion provides the Nebraska Public Power District's reply to a notice of violation issued with NRC Inspection Report 94-03 (Reference). The inspection was conducted at Cooper Nuclear Station (CNS) during the period of January 2 through February 12, 1994.

### Statement of Violation

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, new manually operated primary containment isolation valves, PC-V-506 and -507 were installed during the last refueling outage (March 1993 - July 1993), but the normal position of the manual primary containment isolation valves, an activity affecting quality, was not prescribed by any procedure.

This is a Severity Level IV violation (Supplement I).

### Reason for Violation

Design Change (DC) 90-036 installed two 3/4" instrument taps off the torus drainline during the 1993 Refueling Outage. Each tap has a manual isolation valve (PC-V-506 or PC-V-507) and is now capped until the balance of the design is installed. Since the portion of the torus drainline where the taps were installed is an extension of the Primary Containment, the valves are considered Primary Containment isolation valves. However, no procedure changes were submitted per DC 90-036 to include the valves in a valve checklist procedure. Therefore, the normal position of the valves, an activity affecting quality, was not prescribed by any procedure.

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This non-conformance is documented by NCR 94-019.

This event is attributed to human error on the part of the District design engineer since his review of the design change did not identify the omission of the procedure change. This error may be partially due to the lack of specific guidance in the design change procedures concerning the procedure change requirements for new valves, and the fact that the lines were to be capped downstream of these valves.

A secondary issue associated with this violation involves the lack of specific guidance in the design change review process to review the document change section of the design change. Specific guidance to the appropriate reviewers could possibly have prevented this situation.

#### Corrective Steps Taken and The Results Achieved

Immediately upon discovery of the non-conformance, the valves were verified closed and then tagged closed. The valves are located below the torus water line and there were no visible signs of leakage. The design engineer was informed of the non-conformance and made aware of the need to include any new valves into the appropriate valve checklist procedure. A Procedure Change Notice (PCN) was initiated to add PC-V-506 and PC-V-507 to Procedure 2.2.60A. Temporary Procedure Change Notice (TPCN) 94-033 was also issued to implement these changes for the interim until the PCN is implemented.

#### Corrective Steps Which Will Be Taken To Avoid Further Violations

This violation will be discussed with personnel who prepare design changes to impress upon them the importance of updating all documents which control activities important to safety that are affected by a design change, the nature of the program changes to be performed, and the importance of accountability during the performance of work. Engineering procedures will be revised to include an item in the appropriate checklist to require all new valves to be included in a system valve checklist procedure. In addition, review requirements will be evaluated and more clearly defined to further enhance our existing design change program. These revisions are expected to improve the preparation and subsequent review of future design changes such that future violations of this nature are unlikely.

#### Date When Full Compliance Will Be Achieved

Full compliance will be achieved by August 31, 1994.

#### Additional Item for Discussion

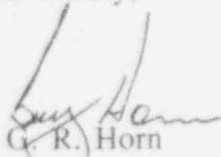
In addition to the above violation, the NRC inspection identified an Unresolved Item (298/9403-01) concerning the use of a single, unlocked, manual valve for a containment isolation

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function. The District wishes to advise it is presently reconstituting the design basis for the Primary Containment system and will evaluate this issue within that task. Likewise, the CNS Plant Engineering Department is pursuing efforts to resolve NRC concerns involving the identification and control of manual primary containment isolation valves. The District plans to complete these efforts by August 1994.

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

Sincerely,



G. R. Horn  
Vice President - Nuclear

cc: NRC Regional Administrator  
Region IV  
Arlington, Texas

NRC Resident Inspector Office  
Cooper Nuclear Station