



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

511 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUN 6 1994

Docket: 50-298
License: DPR-46

Nebraska Public Power District
ATTN: Guy R. Horn, Vice President-Nuclear
P.O. Box 98
Brownville, Nebraska 68321

SUBJECT: NRC INSPECTION REPORT 50-298/94-04 (NOTICE OF VIOLATION)

This refers to the Service Water System Operational Performance Inspection conducted by Elmo E. Collins, and the inspectors identified in the enclosed report, of this office on March 28 through April 1, and April 11-15, 1994. The inspection was performed according to NRC Temporary Instruction 2515/118, "Service Water System Operational Performance Inspection," and included a review of activities authorized for your Cooper Nuclear Station facility. At the conclusion of the inspection, the findings were discussed with you and with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements.

Overall, the team found that the service water system was capable of performing its intended safety functions. There was a relatively low backlog of maintenance work on the service water system, recent design and maintenance activities had addressed significant design and equipment performance problems, and the plant operators were properly operating the system.

Notwithstanding the above, some relatively significant examples were seen that indicated the design was not accurately reflected in output documents, and that the system was operated inconsistently with the design as reflected in the updated safety analysis report and in the service water system design criteria document. Of particular concern were the lack of operations verification and validation of your design criteria document. This indicated weak interaction between your design and licensing organizations and the site, and resulted in inaccurate design documentation.

Based on the results of this inspection, certain licensed activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The first violation was of concern because it showed a lack of rigor in maintaining the updated safety analysis report. The second violation was of concern because it showed that design control measures have not always ensured that the design was completely implemented.

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In addition, an unresolved item was identified regarding reactor equipment cooling heat exchanger performance testing. The team found that the testing was done in a condition significantly different from that which the heat exchangers would experience in the accident scenario. Based on the information provided, the team was not able to conclude that the reactor equipment cooling heat exchanger performance testing produced results that demonstrated functionality in the limiting accident condition.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. In addition, we request that you include in your response documentation demonstrating that the reactor equipment cooling heat exchanger testing effectively demonstrates functionality in the limiting accident condition. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

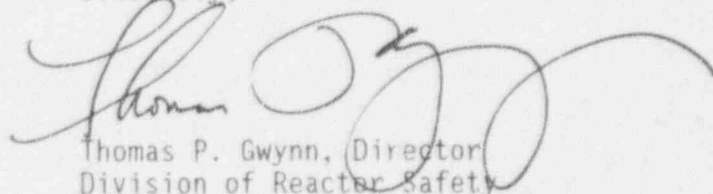
During the inspection, the following commitments were made: (1) Upgrade Maintenance Procedure 7.2.42 as discussed in Section 3.2.2; (2) Upgrade heat exchanger performance testing procedures as discussed in Section 3.2.1.3; (3) Initiate eddy current testing on the reactor equipment cooling heat exchangers as discussed in Section 3.2.4; and, (4) Evaluate the out-of-service time for service water pump discharge strainers as discussed in Sections 4.2 and 5.1.2.2. If your understanding of these commitments is different from that described in the report, please contact me.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Thomas P. Gwynn, Director
Division of Reactor Safety

Enclosures: (see next page)

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report
50-298/94-04 w/attachments

cc w/enclosures:

Nebraska Public Power District
ATTN: G. D. Watson, General Counsel
P.O. Box 499
Columbus, Nebraska 68602-0499

Nebraska Public Power District
ATTN: Mr. David A. Whitman
P.O. Box 499
Columbus, Nebraska 68602-0499

Nebraska Department of Environmental
Control
ATTN: Randolph Wood, Director
P.O. Box 98922
Lincoln, Nebraska 68509-8922

Nemaha County Board of Commissioners
ATTN: Larry Bohlken, Chairman
Nemaha County Courthouse
1824 N Street
Auburn, Nebraska 68305

Nebraska Department of Health
ATTN: Harold Borchert, Director
Division of Radiological Health
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509-5007

Department of Natural Resources
ATTN: Ronald A. Kucera, Department Director
of Intergovernmental Cooperation
P.O. Box 176
Jefferson City, Missouri 65102

Kansas Radiation Control Program Director

E-Mail report to D. Sullivan (DJS)

bcc to DMB (IE01)

bcc distrib. by RIV:

L. J. Callan	Resident Inspector
Branch Chief (DRP/C)	Leah Tremper, OC/LFDCB, MS: MNBB 4503
MIS System	DRSS-FIPB
Branch Chief (DRP/TSS)	Project Engineer (DRP/C)
RIV File	Senior Resident Inspector - River Bend
Senior Resident Inspector - Fort Calhoun	
DRS Team Leader Reading File	
Don Norkin, NRR/RSIB, MS: OWFN 9 A1	

<i>RIV:DP</i>	<i>RIV:EB</i>	<i>RIV:EB</i>	<i>RIV:TE</i>	<i>C:EB</i>
RELautz	CJPaulk	PAWenberg	EECollins	TFWesterman
5/25/94	5/25/94	5/25/94	5/25/94	6/3/94
ADD:DRS <i>My</i>	D:DRP	D:DRS <i>M</i>		
JAMitchell	ABeach	TPGwynn		
6/5/94	6/6/94	6/6/94		

E-Mail report to D. Sullivan (DJS)

bcc to DMB (IE01) 1/1

bcc distrib. by RIV:

L. J. Callan	Resident Inspector
Branch Chief (DRP/C)	Leah Tremper, OC/LFDCB, MS: MNBB 4503
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RIV:OP	RIV:EB	RIV:EB	RIV:TL	C:EB
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5/25/94	5/25/94	5/25/94	5/25/94	6/3/94

ADD:DRS	D:DRP	D:DRS
JAMitchell	ASearch	TPGwynn
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