



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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

JUN 15 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: RESPONSE TO NRC INSPECTION REPORT 50-298/94-11

Thank you for your letter of May 25, 1994, in response to our letter dated April 22, 1994, which discussed two weaknesses identified during a routine emergency preparedness inspection (50-298/94-11). We have reviewed your reply and find it responsive to the concerns raised in our inspection report. We will review the implementation of your corrective actions during a future inspection to determine their effectiveness.

Sincerely,

Samuel J. Collins, Director
Division of Radiation Safety
and Safeguards

cc:
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

210070

9406220010 940615
PDR ADDOCK 05000298
Q PDR

JE35

Nebraska Public Power District -2-

Nebraska Department of Environmental
Quality
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: R. A. Kucera, Department Director
of Intergovernmental Cooperation
P.O. Box 176
Jefferson City, Missouri 65102

Kansas Radiation Control Program Director

Program Manager
FEMA Region 7
911 Walnut Street, Room 200
Kansas City, Missouri 64106

Director
Nebraska Civil Defense Agency
1300 Military Road
Lincoln, Nebraska 68508

bcc to DMB (IE35)

bcc w/copy of licensee's letter dated May 25, 1994:

L. J. Callan	CNS Resident Inspector
Branch Chief (DRP/C)	Leah Tremper, OC/LFDCB, MS: MNBB 4503
MIS System	DRSS-FIPB File (Hodges)
Branch Chief (DRP/TSS)	Project Engineer (DRP/C)
RIV File	Senior Resident Inspector - River Bend
Senior Resident Inspector - Fort Calhoun	
B. Murray, DRSS/RIB	A. D. McQueen, WCFO (DRSS/RIBi)

RIV:RIB	C:RIB	D:DRSS		
ADMcQueen:nh	BMurray	SJCollins		
6/10/94	6/10/94	6/14/94		

Nebraska Public Power District

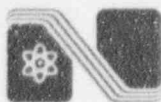
-3-

bcc to DMB (IE35)

bcc w/copy of licensee's letter dated May 25, 1994:

L. J. Callan	CNS Resident Inspector
Branch Chief (DRP/C)	Leah Tremper, OC/LFDCB, MS: MNBB 4503
MIS System	DRSS-FIPB File (Hodges)
Branch Chief (DRP/TSS)	Project Engineer (DRP/C)
RIV File	Senior Resident Inspector - River Bend
Senior Resident Inspector - Fort Calhoun	
B. Murray, DRSS/RIB	A. D. McQueen, WCFO (DRSS/RIBi)

RIV:RIB	C:RIB	D:DRSS		
ADMcQueen:nh	BMurray	SJCollins		
10/10/94	10/10/94	6/14/94		



Nebraska Public Power District

COOPER NUCLEAR STATION
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402)825-3811
FAX (402)825-5211

NSD940497
May 25, 1994

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

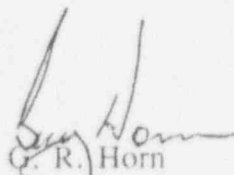
Subject: NPPD Response to Inspection Report 50-298/94-11

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. R. Horn

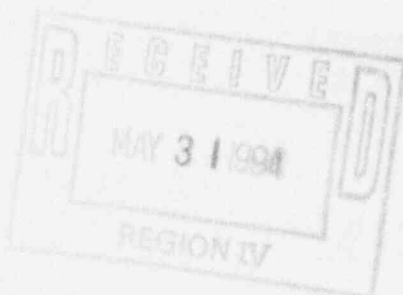
Vice President - Nuclear

GRH/SJJ:ju

Attachment

cc: Regional Administrator
USNRC - Region IV

NRC Resident Inspector
Cooper Nuclear Station



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 EIP 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 EIP requirements; future training will include EIP actions expected to be performed by the crew.

Schedule of Implementation

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