



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

July 21, 1982

OFFICE OF THE  
SECRETARY

~~ORCD~~  
OGL

*Robert Cunningham*  
*DeYoung*  
*Dutton*  
*Collins, RIV*

MEMORANDUM FOR: Leonard Bickwit, Jr., General Counsel  
FROM: Samuel J. Chilk, Secretary  
SUBJECT: PROPOSED CIVIL PENALTY ACTION  
(EA-82-46)

In connection with this action the Commission has requested that you draft a "Statement of the Commission" (as was done in CLI-82-1, Diablo Canyon) for issuance in connection with the Proposed Civil Penalty Action for the Nebraska Public Power District. The Statement should indicate that the Commission has approved the NRC staff's issuance of a Notice of Violation and a proposed civil penalty for the Nebraska Public Power District in connection with Material False Statements made by the licensee and the licensee's failure to complete implementation of the prompt notification system.  
(OGC) (SECY SUSPENSE: 7/27/82)

cc: Chairman Palladino  
Commissioner Gilinsky  
Commissioner Ahearne  
Commissioner Roberts  
Commissioner Asselstine  
OPE  
EDO

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PDR FOIA  
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*Handwritten initials*

August 9, 1982  
EN 82-28

OFFICE OF INSPECTION AND ENFORCEMENT  
NOTIFICATION OF SIGNIFICANT ENFORCEMENT ACTION

Licensee: Nebraska Public Power District, Columbus, Nebraska  
Docket No. 50-298  
Cooper Nuclear Power Station

Subject: PROPOSED IMPOSITION OF CIVIL PENALTY - \$300,000  
ORDER MODIFYING LICENSE EFFECTIVE IMMEDIATELY

This is to inform the Commission that a Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Three Hundred Thousand Dollars and also an Order Modifying License Effective Immediately have been issued today to Nebraska Public Power District.

A news release has been prepared and will be issued about the time the licensee receives the Notice and Order. The State of Nebraska will be notified.

Contact: J. Lieberman, IE 24909                      R. DeYoung, IE 27397

Distribution:

H SE <u>11:30</u>	MNBB <u>11:06</u>	Phillips <u>11:08</u>	EW _____	Willste <u>11:10</u>
Chairman Palladino	EDO	NRR	IE	NMSS
Comm. Gilinsky	DED/ROGR		OIA	RES
Comm. Ahearne	ELD		AEOD	
Comm. Roberts	PA			
Comm. Asselstine	Air Rights <u>11:12</u>			
ACRS	SP			
SECY	RM			
CA				
PE	Regional Offices		MAIL	
	I <u>11:20</u>	IV <u>11:15</u>	ADM: Doc. Mgt. Br.	
	II <u>11:22</u>	V <u>11:26</u>		
	III <u>11:24</u>			

PRELIMINARY INFORMATION - NOT FOR PUBLIC DISCLOSURE UNTIL AUGUST 9, 1982

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~~8228100055~~  
PDR-LPDR

*H. J. Jensen*

AUG 09 1982

Docket No. 50-298  
EA 82-46

Nebraska Public Power District  
ATTN: Mr. H. B. Kasman,  
Chairman of the Board of Directors  
P.O. Box 499  
Columbus, Nebraska 68601

Gentlemen:

During January 1982 the NRC Region IV Emergency Preparedness Analyst had a telephone conversation with two members of the Nebraska Public Power District (NPPD) management organization to obtain information on the status of the prompt public notification system which was required by 10 CFR 50.54(s)(2)(i) and Section IV.D.3 of Appendix E to 10 CFR Part 50 (46 FR 63032, December 30, 1981) to be installed and tested by February 1, 1982. The Region IV Emergency Preparedness Analyst was informed by these individuals that the system was installed and operational. In a letter to the Region IV Regional Administrator dated February 8, 1982, NPPD reiterated in writing that a system was installed and operational. It is our understanding that this letter inadvertently referenced a January 1981 letter rather than a June 1981 letter for the description of the notification system. In any event, neither of the described systems was installed.

On March 9, 1982 the NRC staff had a meeting with members of the NPPD's General Office staff at the plant site to discuss the prompt public notification system. Again, members of the NPPD's staff orally confirmed that the system was installed and operational, and provided an informational handout which also indicated this status. A member of the NPPD's staff offered to demonstrate that the system was complete and operational. Accordingly, an NRC representative and the Station Superintendent visited the Nemaha, Nebraska Volunteer Fire Department to verify the status of the mobile sirens at that location. These mobile siren units (32 individual siren units distributed among 6 area volunteer fire departments) were identified by NPPD as an integral part of the prompt public notification system. During this visit, one mobile siren unit was found still in its shipping carton. In light of this discovery, the NRC Region IV Regional Administrator directed that a special inspection and an investigation be conducted to determine the status of all mobile siren units.

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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~~8208315441~~  
PDR-LPWR

(26)

On March 11, 1982 two NRC inspectors made contact with representatives of each of the six volunteer fire departments that had received mobile siren units as part of the prompt public notification system. This inspection effort revealed five mobile siren units in their original cartons and one additional unit missing a component. Moreover, our further investigation into this matter found that those departments apparently did not receive training nor instructions as to their role in implementing the required prompt notification system. In addition, there were no written procedures to govern the operation of the mobile siren system. In effect, NPPD failed to comply with the NRC's requirements in the area of prompt public notification. After the March 11, 1982 exit interview conducted to discuss the emergency preparedness exercise, the NRC Region IV Administrator insisted that immediate administrative measures be established to assure that prompt public notification of the population within the 10 mile emergency planning zone would take place. A Confirmatory Action Letter was issued on March 12, 1982 to assure that compensatory action would be taken to provide an acceptable interim level of notification pending the modification of the installed system, the development of effective implementing procedures, and the implementation of a training program, to assure full compliance on a long-term basis with the prompt notification system requirement.

The cause of both this violation and the inaccurate communications with the Commission appears to be inadequate corporate office management attention to and involvement in completion of the prompt notification system. We understand that the plant management duty-stationed at the site was not involved with management responsibility for installation and testing of the system. This responsibility was assigned to and accepted by management personnel duty-stationed in the corporate offices in Columbus, Nebraska. The responsible corporate managers established neither QA audits nor surveillance requirements to monitor implementation of the system. Written procedures were not developed for implementation and operation of the system. The NPPD action tracking system stopped tracking the status of the mobile system in July 1981, notwithstanding that the system was not complete. Information was given to the NRC in January 1982 concerning the status of the system without checking with the project manager or lead engineer. The project manager did not question the February 8, 1982 letter even though he had information indicating the letter was not accurate. The project manager was not supportive of the lead engineer's requests for assistance nor did he seek additional resources from upper management. Management at all levels in the corporate office left implementation of the system to the lead engineer without instructions as to what was required or how to implement the system to meet the Commission's requirements. Although the lead engineer gave erroneous information to the NPPD staff, the Commission does not view his action as the cause of the violation in this case or as the basis of the attached Notice of Violation and Proposed Civil Penalty. There was no indication that management took any steps on its own initiative to determine that the February 1, 1982 deadline for installation and initial testing of the prompt notification system would be met. The failure to assure that the system was installed, operational, and tested by February 1, 1982 and to be aware of the system's status demonstrates unacceptable performance by NPPD management. This matter was discussed in an enforcement conference with Mr. D. W. Hill, two members of the NPPD Board of Directors, and a member of Mr. Hill's staff on April 12, 1982. This unacceptable performance by NPPD management, and not the erroneous information provided to the NPPD staff, constitutes the cause of the violations in this case.

We are extremely concerned with the communications in January, February, and March 1982 in which false information was provided the Commission concerning the status of the prompt notification system. The Commission views these false statements as a direct result of the NPPD management failures described above. Candor between the NRC and its licensees is fundamental to the regulatory process. Anything less than accurate and complete statements to the Commission cannot and will not be tolerated. Accordingly, in order to emphasize the need for direct licensee management involvement in the full spectrum of NRC licensed activities, and to emphasize the need for complete and accurate communications with the Commission, a civil penalty is being proposed for each of the affirmative statements made by your staff which erroneously stated that the prompt notification system was complete. Each of these statements is a material false statement and has been categorized at a Severity Level II in accordance with Supplement VII of the NRC Enforcement Policy, 10 CFR Part 2, Appendix C. In view of the serious breakdown in management controls as demonstrated by management inattention resulting in multiple false statements, the basic civil penalty for a Severity Level II violation of \$64,000 is being increased to \$96,000 for each material false statement. The flagrant misrepresentations here, on an issue so related to public health and safety and so prominent a concern to the Commission, require a substantial penalty to provide clear notice to NPPD and other licensees that similar actions cannot be tolerated. In addition, consistent with the enforcement action contemplated for licensees who had not completed installation and initial testing of the prompt public notification system by March 1, 1982, a civil penalty of \$1000 is being proposed for each day between March 1 and March 12, 1982 during which time NPPD failed to complete the required installation and testing. Similarly, civil penalties are not being proposed for the noncompliance during the month of February. This continuous violation has been categorized as a Severity Level III violation. The civil penalty proposed for this period is \$12,000. The total civil penalty proposed is \$300,000.

You are required to respond to the Notice of Violation and Proposed Imposition of Civil Penalty and, in preparing your response, you should follow the instructions specified in the Notice.

In addition we have enclosed an Order Modifying License (Immediately Effective) which requires NPPD to submit a plan and implement it, after NRC approval, for the purpose of improving management control and oversight of licensed activities.

You are also directed to meet with me within 30 days to explain the cause of the lack of control of licensed activities, to describe what actions have been taken to assure that the underlying causes of this violation are well understood and corrected and to discuss those actions that you have taken or plan to take in response to the enclosed Order to assure that management is properly conducting nuclear related activities. In addition, we will expect you to explain what steps have been taken or will be taken to assure that communications between NPPD and NRC are complete and accurate and that employees at all levels within NPPD understand that nothing less is acceptable. You should bring with you to this meeting the individuals involved in this matter. Please contact James Lieberman, Director of Enforcement, (301) 492-4909, to make arrangements for this meeting.

Your response to the enclosed Notice and the information presented during our forthcoming meeting will be the basis for determining what additional enforcement action, if any, should be taken, including the appropriateness of action against employees involved in this matter. We will also consider whether additional enforcement action should be taken for continuing noncompliance with the prompt notification requirements between March 13, 1982 and the date of compliance.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Appendix are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

*Original signed by*  
R. C. DeYoung

Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Enclosure:  
Notice of Violation and Proposed  
Imposition of Civil Penalty  
Order Modifying License  
(Immediately Effective)

IE:ES JHenderson 8/6/82	RIV 1/82	<i>R. Hoefling</i> ELD <i>by phone</i> 8/6/82 <i>Jat</i>	<del>Black</del> ES:D JLieberman 8/2/82	IE:SD JSniezek 8/9/82	IE:D RDeYoung 1/82
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Nebraska Public Power District

Distribution

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EDO Rdg File

Paul L. Douglas  
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Lincoln, NE 68509

Terrence L. Kubicek, Exec. Secy.  
Public Service Commission  
301 Centennial Mall, S.  
Lincoln, NE 68509

NOTICE OF VIOLATION  
AND  
PROPOSED IMPOSITION OF CIVIL PENALTY

Nebraska Public Power District  
Cooper Nuclear Power Station

Docket 50-298  
EA 82-46

As a result of the special inspection conducted at the Cooper Nuclear Power Station, Nemaha County, Nebraska on March 11 and 22, 1982 and the investigation conducted on March 15-30, 1982, it appears that violations of NRC requirements have occurred. These violations relate to the timely installation and testing of the prompt public notification system required by 10 CFR 50.54(s)(2)(i) and Section IV.D.3 of Appendix E to 10 CFR Part 50. It appears that, contrary to information provided to the NRC by the Nebraska Public Power District (NPPD) in January, February, and March 1982, the prompt public notification system, which was required to be installed and tested by February 1, 1982, was not, and had not been as of March 12, 1982. This condition apparently arose as a result of inadequate involvement of licensee's management to assure compliance with the prompt notification system requirement and not from the action of the licensee's lead engineer who provided erroneous information to the licensee's staff.

Accordingly, in order to emphasize the need for direct licensee management involvement in the full spectrum of NRC-licensed activities and the need for complete and accurate communication with the Commission, civil penalties of \$96,000 are being proposed for each of three material false statements made related to NRC requirements for prompt public notification and civil penalties of \$12,000 are being proposed for the failure between March 1 and March 12, 1982 to install and initially test a prompt notification system.

In accordance with the NRC Enforcement Policy (10 CFR Part 2 Appendix C) 47 FR 9987 (March 9, 1982) and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2282 PL 96-295 and 10 CFR 2.205, the violations and the associated civil penalties are set forth below.

- I. During a telephone conversation in January 1982 between C. A. Hackney, NRC Region IV and NPPD's Manager of Licensing and a licensing engineer, in a February 8, 1982 letter to NRC Region IV from the NPPD's Division Manager of Licensing and Quality Assurance, and during a March 9, 1982 oral briefing to NRC by various NPPD personnel, the licensee stated that the prompt public notification system for the Cooper Nuclear Station had been installed and was operational.

Contrary to the above, when the statements referred to were made, the NPPD prompt notification system was not installed and operational. Each of the statements made by licensee representatives in January 1982, on February 8, 1982 and on March 9, 1982 concerning the status of the prompt notification system constituted a material false statement within the meaning of Section 186 of the Atomic Energy Act of 1954, as amended. The statements were false in that as of March 9, 1982 the prompt notification system was neither installed nor operational. The false statements were material in that had the NRC known of the true situation action would have been taken by NRC to assure compliance.

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PDR-LPDR



Each material false statement is a Severity Level II violation and is assessed a proposed civil penalty of \$96,000. A cumulative civil penalty of \$288,000 is proposed for the three material false statements.

- II. The Commission's regulations, specifically, 10 CFR 50.54(s)(2)(i) and Section IV.D.3 of Appendix E to 10 CFR Part 50 require that each facility holding an operating license shall by February 1, 1982 demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway emergency planning zone.

Contrary to the above, during an inspection conducted on March 11, 1982, the NRC determined that the licensee had not demonstrated that administrative and physical means had been established for alerting and providing prompt instructions to the public within the plume exposure pathway emergency planning zone. Specifically, five of the mobile sirens identified by the licensee in its Emergency Plan as part of its prompt notification system had not been removed from their shipping containers and a sixth mobile siren had a missing part. Further, during the investigation, statements from representatives of the local volunteer fire fighting organizations who were to use the mobile sirens indicate that they had not received indoctrination or training prior to March 12, 1982 with respect to their role in the operation of the prompt public notification system. As a result, the facility was operated with an inoperable public notification system from February 1, 1982 through March 12, 1982, inclusive, a period of 40 days.

For the first 12 days in March, 1982 each day of failure to meet the requirements for a prompt public notification system constitutes a separate Severity Level III violation. A daily civil penalty of \$1,000 is being proposed for each day for a cumulative civil penalty in the amount of \$12,000 for these violations.

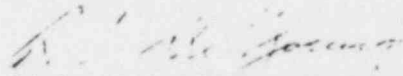
Pursuant to the provisions of 10 CFR 2.201, Nebraska Public Power District is hereby required to submit to this office within 30 days of the date of this Notice a written statement or explanation, including for each alleged violation: (1) admission or denial of the alleged violation; (2) the reasons for the violation if admitted; (3) the corrective steps which have been taken and the results achieved; (4) the corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Within the same time as provided for the response required above under 10 CFR 2.201, Nebraska Public Power District may pay the civil penalties in the total amount of \$300,000 or may protest imposition of the civil penalties in whole or

in part by a written answer. Should Nebraska Public Power District fail to answer within the time specified, this office will issue an order imposing the civil penalties in the amounts proposed above. Should Nebraska Public Power District elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalties, such answer may: (1) deny the violations listed in this Notice in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalties should not be imposed. In addition to protesting the civil penalties in whole or in part, such answer may request remission or mitigation of the penalties. In requesting mitigation of the proposed penalties, the five factors contained in Section IV (B) of 10 CFR Part 2, Appendix C should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. Nebraska Public Power District's attention is directed to the other provisions of 10 CFR 2.205, regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalties due, which have been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalties, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION

  
Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Dated at Bethesda, Maryland  
this 9th day of August 1982

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

In the Matter of

Nebraska Public Power District  
Cooper Nuclear Station

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Docket No. 50-298  
License No. DPR-46  
EA 82-46

ORDER MODIFYING LICENSE EFFECTIVE IMMEDIATELY

I

The Nebraska Public Power District (NPPD) (the "licensee") is the holder of Facility Operating License No. DPR-46 (the "license") which authorizes the operation of the Cooper Nuclear Station at steady state reactor core power levels not in excess of 2381 megawatts thermal (rated power). The facility consists of a boiling water reactor (BWR), located at the licensee's site in Nemaha County, Nebraska.

II

The Commission's regulations, specifically, 10 CFR 50.54(s)(2)(i) and Section IV.D.3 of Appendix E to 10 CFR 50 (46 FR 63032, December 30, 1981) require each operating nuclear power plant to install and test a prompt public notification system by February 1, 1982. During January 1982 the NRC Region IV Emergency Preparedness Analyst had a telephone conversation with two members of the NPPD management organization concerning the status of this system. He was informed that the prompt public notification system was installed and operational. In a letter to the Region IV Administrator dated February 8, 1982, NPPD reiterated in writing that the system was installed and operational.

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PDR/LPDR

On March 9, 1982, the NRC staff had a meeting with members of the NPPD's General Office staff at the plant site to discuss the prompt public notification system. Again, members of the NPPD's staff orally confirmed that the system was installed and operational, and provided an informational handout which also indicated this status. A member of the NPPD's staff offered to demonstrate that the system was complete and operational. Accordingly, an NRC representative and the Station Superintendent visited the Nemaha, Nebraska Volunteer Fire Department to verify the status of the mobile sirens at that location. These mobile siren units (32 individual siren units distributed among 6 area volunteer fire departments) were identified by the NPPD as an integral part of the prompt public notification system. During this visit, one mobile siren unit was found still in its shipping carton. In light of this discovery, the Region IV Administrator directed that a special inspection and an investigation be conducted to determine the status of all mobile siren units.

On March 11, 1982 two NRC inspectors made contact with representatives of each of the six volunteer fire departments that had received mobile siren units as part of the prompt public notification system. This inspection effort revealed five mobile siren units in their original cartons and one additional unit missing a component. Moreover, further investigation into this matter found that those departments apparently did not receive training nor instructions as to their role in implementing the required prompt notification system. In addition, there were no written procedures to govern the operation of the mobile siren system. In effect, NPPD failed to comply with the NRC's requirements in

the area of prompt public notification. After the March 11, 1982 exit interview conducted to discuss the emergency preparedness exercise, the NRC Region IV Administrator insisted that immediate administrative measures be established to assure that prompt public notification of the population within the 10 mile emergency planning zone would take place. A Confirmatory Action Letter was issued on March 12, 1982 to assure that compensatory action would be taken to provide an acceptable interim level of notification pending the modification of the installed system, the development of effective implementing procedures, and the implementation of a training program, to assure full compliance on a long-term basis with the prompt notification system requirement.

The cause of both the noncompliance with the Commission's prompt notification requirements and the inaccurate communications with the Commission appears to be inadequate corporate office management attention to and involvement in completion of the prompt notification system. We understand that the plant management duty-stationed at the site were not involved with management responsibility for installation and testing of the system. This responsibility was assigned to and accepted by management personnel duty-stationed in the corporate offices in Columbus, Nebraska. These personnel apparently failed to define adequate criteria to determine system completion and apparently failed to commit sufficient resources to ensure timely completion of the system. The responsible corporate managers established neither QA audits nor surveillance requirements to monitor installation of the system. Written procedures were not developed for implementation and operation of the system. The NPPD action tracking system stopped tracking the status of the mobile system in July 1981, notwithstanding that the system was

not complete. Information was given to the NRC in January 1982 concerning the status of the system without checking with the project manager or lead engineer to assure its accuracy. The project manager did not question the February 8, 1982 letter to the Region IV Administrator incorrectly stating that the system was installed and operational even though he had information indicating the letter was not accurate. The project manager was not supportive of the lead engineer's requests for assistance to complete system installation in a timely manner nor did he seek additional resources from upper management. Management at all levels in the corporate office left implementation of the system to the lead engineer without instructions as to what was required to implement the system to meet the Commission's requirements. There was no indication that management took any steps on its own initiative to determine that the February 1, 1982 deadline for installation and initial testing of the prompt notification system would be met. The failure to assure that the system was installed, operational, and tested by February 1, 1982 and to be aware of the system's status demonstrates unacceptable performance by NPPD management. This unacceptable level of performance was exacerbated by the repeated inaccurate statements made to the Region IV Administrator regarding the status of the prompt notification system. These matters were discussed in an enforcement conference with Mr. D. W. Hill, two members of the NPPD Board of Directors, and a member of Mr. Hill's staff held with the Regional Administrator on April 12, 1982. In addition, the Director of the Office of Inspection and Enforcement has proposed that civil penalties be imposed for NPPD's failure to implement the prompt notification system in a timely manner and for the material false statements made to the Commission regarding this system's status.

III

The events described in Section II, reveal substantial serious breakdowns in Nebraska Public Power District's management controls related to the Cooper Nuclear Station. Continued operation of the Cooper Nuclear Station requires significant changes in Nebraska Public Power District's control of licensed activities. Accordingly, I have determined that the actions set forth below are required by the public health, safety, and interest, and therefore, should be imposed by an immediately effective order.

IV

In view of the foregoing, pursuant to Sections 103 and 161(i) of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Part 2 and 10 CFR Part 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT:

Within 30 days of this Order, the licensee shall submit to the Region IV Administrator for review and approval, a comprehensive plan of action that will include an independent appraisal of site and corporate management organizations and functions, and recommendations for improvements in communications, management controls, and oversight. Upon approval of the plan, the plan shall be implemented and the scheduled dates for completion of the milestones shall not be extended without good cause and the concurrence of the Region IV Administrator.

The plan shall include at least the elements itemized below:

- (1) An appraisal conducted by an independent organization retained by the licensee to evaluate current organizational responsibilities, management controls, staffing levels and competence, communications systems and practices both at and between the corporate office and the facility. This organization shall be directed to make recommendations for changes in the aforementioned areas that will provide assurance that the licensee will implement NRC requirements.
- (2) A description of the appraisal program, the qualifications of the appraisal team, a discussion of how the appraisal is to be documented, and a schedule with appropriate milestones for implementation of the plan.
- (3) Actions to assure that future information supplied by Nebraska Public Power District to the NRC, pertaining to analyses, designs, and the compliance of systems important to safety, is complete and accurate.
- (4) A system of audits by management representatives aimed at assuring conformance to requirements and continued adherence to changes which result from the reviews identified in items (1) and (3) above.



The licensee shall promptly submit to the Region IV Administrator a copy of the independent evaluation required by item (1) above. In addition, the licensee shall consider the recommendations made in item (1) and provide to the Region IV Administrator, within 30 days of receipt of the evaluation an analysis of each such recommendation and the action to be taken in response to the recommendations. The licensee shall also provide a schedule for accomplishing these actions.

The Administrator of Region IV may relax or terminate in writing any of the preceding conditions for good cause.

V

The licensee may request a hearing on this Order within 30 days of its issuance. A request for a hearing shall be submitted to the Director, Office of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy of the request shall also be sent to the Executive Legal Director at the same address. ANY REQUEST FOR A HEARING SHALL NOT STAY IN THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested, the Commission will issue an order designating the time and place of any such hearing. If a hearing is held, the issue to be considered at such hearing shall be:

Whether on the basis of the matters set forth in Section II of this Order, this Order should be sustained.

In the event that a need for further enforcement action becomes apparent, either in the course of a hearing or any other time, appropriate action will be taken by the Director.

FOR THE NUCLEAR REGULATORY COMMISSION

Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Dated at Bethesda, Maryland  
this 9th of August 1982

Docket: 50-298/82-09  
50-298/82-11

AUG 9 1982

Nebraska Public Power District  
ATTN: Mr. D. W. Hill, General Manager  
P. O. Box 499  
Columbus, Nebraska 68601

Gentlemen:

Enclosed please find the reports of an NRC special inspection conducted on March 11 and March 22-23, 1982, 50-298/82-11, and of an NRC investigation conducted March 15-30, 1982, 50-298/82-09. Paragraph 2 of the inspection report also refers to the enforcement conference held at the Cooper Nuclear Station on March 11, 1982, between members of your staff and Mr. John T. Collins, Regional Administrator and members of the Region IV NRC staff. Additional discussion of the investigative and inspection findings were held in the Region IV office on April 12, 1982, with you and several NPPD representatives and myself and members of my staff. No new violations of NRC requirements were identified during these discussions.

Areas examined during the special inspection and investigation and our findings are discussed in the enclosed reports. Within these areas, the inspection consisted of selective examination of procedures and representative records, interviews with personnel, and observations by the inspector.

During the special inspection (50-298/82-11), it was found that certain activities under your license appear to be in violation of Appendix E to 10 CFR Part 50 of the NRC Regulations. The Notice of Violation for the violation reported in paragraph 2 of the enclosed inspection report was forwarded to you by the Director, Office of Inspection and Enforcement, therefore, this letter does not require further response regarding this matter.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

RIV								
IES	RPS-A	RPB-1	FRPS	TPB	DRR&EP	DIES	RA	
EJohnson/bb	TWesterman	GMadsen	LWilborn	GDBrown	JGagliardo	EJohnson	JTCollins	
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PDR-LPDR

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

Sincerely,

Original signed by  
John T. Collins

John T. Collins  
Regional Administrator

Enclosures:

1. Appendix A - NRC Inspection Report 50-298/82-11
2. Appendix B - NRC Investigation Report 50-298/82-09

cc:

L. C. Lessor, Station Superintendent  
Cooper Nuclear Station  
P.O. Box 98  
Brownville, NE 68321

bcc to DMB IE01)

BC  
PM  
AEOD  
ELD  
IE FILE  
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NRR/DHFS  
NRR/OLB  
RAD ASMT BR  
RESEARCH  
PDR:HQ  
LPDR  
NSIC  
NTIS

bcc distrib. by RIV:

E. Johnson  
L. Wilborn  
B. Murray  
T. Westerman  
TPB  
RPB2  
INFO SYSTEMS  
J. Collins  
RIV File  
Kansas State Dept. Health  
Nebraska State Dept. Health

Appendix A

U. S. Nuclear Regulatory Commission  
Region IV

Report: 50-298/82-11

Docket: 50-298

License: DPR 46

Licensee: Nebraska Public Power District  
P. O. Box 499  
Columbus, Nebraska 68601

Facility Name: Cooper Nuclear Station

Inspection at: Cooper Nuclear Station, Nemaha County, Nebraska

Inspection conducted: March 11 and March 22-23, 1982

Inspectors: E. H. Johnson 4/8/82  
E. H. Johnson, Reactor Inspector  
Reactor Project Section A Date

Lorenzo Wilborn 4/8/82  
L. Wilborn, Radiation Specialist  
Facilities Radiation Protection Section Date

Reviewed: B. Murray 4/8/82  
B. Murray, Chief  
Facilities Radiation Protection Section Date

Approved: T. F. Westerman 4/8/82  
T. F. Westerman, Chief  
Reactor Project Section A Date

Inspection Summary

Inspection Conducted March 11 and March 22-23, 1982 (Report 50-298/82-11)

Areas Inspected: Special unannounced inspection of the capability of the emergency warning system to promptly notify the population within the plume exposure pathway of the emergency planning zone as contained in 10 CFR 50, Appendix E.4.d and follow up on the licensee's corrective actions on the emergency warning system. The inspection involved 37 inspector-hours by two NRC inspectors.

Results: Within the areas inspected, one apparent violation was identified (violation-lack of capability for providing prompt public notification of a portion of the emergency warning system paragraph 2).

~~8208240177~~  
PDR/LPDR

Details1. Persons ContactedColumbus General Office Personnel-NPPD

- \*R. Buntain, Division Manager Operations
- \*C. Jones, Assistant General Manager-Operations
- \*R. Kamber, Senior Division Manager-Operations
- \*J. Pilant, Division Manager Licensing and Quality Assurance
- \*J. Weaver, Licensing Manager

Cooper Nuclear Station

- \*+L. Lessor, Station Superintendent
- \*J. Sayer, Emergency Planning Coordinator
- G. Smith, QA Specialist

Other Personnel

- T. Curtright, Nemaha, NE, Volunteer Fire Dept. Chief <sup>1/</sup>
- B. Hardy, Peru, NE, Volunteer Fire Dept. Chief <sup>1/</sup>
- W. Hart, Brownville, NE, Volunteer Fire Dept. Chief
- E. Kerr, Rockport, MO, Volunteer Fire Dept. Asst. Chief
- D. Larsen, Watson, MO, Volunteer Fire Dept. Chief
- T. Shafer, Shubert, NE, Volunteer Fire Dept. Chief
- G. Boan, Nemaha County Sheriff
- G. Littles, Atchison County Deputy Sheriff
- L. Brown, Atchison County Deputy Sheriff

NRC Personnel Present at the Enforcement Conference March 11, 1982

- J. Collins, Regional Administrator, Region IV
- E. Johnson, Reactor Inspector, Region IV
- C. Hackney, Emergency Preparedness Analyst, Region IV
- D. Rohrer, Emergency Preparedness Analyst, NRR
- D. DuBois, Senior Resident Reactor Inspector, Region IV

In addition, the inspectors contacted other clerical and administrative personnel.

\*Present at enforcement conference on March 11, 1982

+Present at exit interview on March 23, 1982

## 2. Emergency Warning System

In his letter of January 2, 1981 (NPPD: J. M. Pilant to NRC: H. R. Denton), the licensee proposed to meet the prompt public notification requirements of Appendix E to 10 CFR Part 50 with an emergency warning system (EWS) consisting of 9 fixed sirens and 12 mobile sirens. The mobile siren units were described as skid mounted sirens that could be carried in the bed of a pickup truck. In a letter dated June 30, 1981 (NPPD: J. M. Pilant to NRC: H. R. Denton), the licensee indicated that the plans for the mobile portion of the EWS had been changed to bar mounted siren units which could be carried on the roof of a vehicle. The number of mobile sirens had been changed to 32 portable sirens carried by volunteer firemen and 6 sirens in sheriff's vehicles, all to be driven over rural routes that are out of range of the fixed sirens.

As set out in Appendix E to 10 CFR 50, the required completion date for installation and testing of the EWS was February 1, 1982. By letter dated February 8, 1982 (NPPD: J. M. Pilant to NRC: J. T. Collins), the licensee informed the USNRC that the EWS was installed and operational.

On March 9, 1982, an NRC Review Team visited the site in preparation for the emergency preparedness exercise scheduled for March 10, 1982. In a meeting to discuss the EWS on March 9, 1982, two of the NRC Review Team members, Mr. C. Hackney (Emergency Preparedness Analyst, Region IV) and Mr. D. Rohrer (Emergency Preparedness Analyst, NRR) were again told by licensee representatives that the EWS was installed and operational. For the mobile portion of the system, the licensee indicated that the siren units had been distributed as follows:

Nebraska:	Peru	5 units
	Brownville	5 units
	Nemaha	5 units
	Shubert	2 units
Missouri:	Rockport	10 units
	Watson	5 units

To demonstrate that the early warning system was installed, an NRC representative accompanied an NPPD representative to Nemaha, Nebraska, on March 9, 1982. It was discovered that one portable siren was still packaged in its original container.

On March 11, 1982, a special inspection was conducted by two NRC inspectors to verify the status of the mobile siren units that had been distributed to volunteer fire departments as indicated above. The NRC inspectors visited each of the indicated communities and made contact with the chief or other representative of the volunteer fire department to verify the portable siren status. Paragraph 1 shows the persons contacted.

The inspectors discovered that the status of the 32 units was as follows:

Peru	3 units installed on volunteer fire department members' vehicles 2 units still in the shipping carton
Brownville	3 units mounted on municipal fire department trucks 2 units stored at the fire house and rigged for quick installation on any vehicle
Nemaha	1 unit mounted on municipal fire department truck 3 units installed on volunteer fire department members' vehicles 1 unit still in the shipping carton
Shubert	2 units still in the shipping carton
Rockport	All 10 units installed on volunteer fire department members' vehicles (this information was given to the NRC inspectors by the assistant fire chief, who thought it to be correct; however, it was later learned that one unit was still in its original carton while a second unit had recently been turned in by a person who had just left the volunteer fire department).
Watson	4 units installed on volunteer fire department members' vehicles 1 unit missing a component

Following this special inspection, an enforcement conference was held at the Cooper Nuclear Station with the licensee to discuss these findings. The licensee was represented by those persons denoted in paragraph 1. Mr. John T. Collins, Regional Administrator, NRC Region IV, and other members of the USNRC staff as indicated in paragraph 1, represented the Commission. The licensee was informed that the inoperability of 6 mobile siren units (later determined to be 8) out of 32 mobile units rendered this portion of the EWS inoperable and was an apparent violation of 10 CFR 50, Appendix E.

Since this system was required by regulation to be capable of providing prompt public notification from February 1, 1982, and had been reported to the NRC as such, Mr. Collins indicated that he was greatly concerned and he solicited an immediate response from the licensee representatives as to their plans for restoring the EWS to operability. Mr. Jones stated that the EWS would be restored to its designed notification capability by March 20, 1982.



In the interim, Mr. Collins indicated that contingency measures must be established from that evening to assure that notification of the surrounding population could be made. The licensee agreed to do this. The licensee further indicated that NPPD had, similarly, been looking into the operability of the mobile units that morning and had made a finding similar to that of the NRC inspectors. They stated that although the mobile units were distributed as indicated above, there was built-in excess in the system in that the actual number of required units for some locations (determined from the number of rural routes to be covered) was less than the number of units distributed to that station (except Shubert, Nebraska). This did not excuse the fact, they admitted, that insufficient operable units were in place in all locations to accomplish notification, as required.

Mr. Collins acknowledged the licensee's commitments for restoring the EWS to operability and said that a letter confirming these actions would be sent to the licensee the next day.

On March 12, 1982, a Confirmatory Action Letter was sent to the licensee (Mr. J. T. Collins, USNRC RIV to NPPD: J. M. Pilant) acknowledging that the licensee intended to take corrective actions as follows:

- "1. The licensee shall make 31 early warning system mobile siren units operable (installed on a vehicle or ready for immediate [5 minutes] installation), with parts on order for the remaining unit. Each unit shall be functionally tested on the vehicle for which it was intended.
- "2. The licensee shall provide an analysis of the minimum number of mobile siren units (in addition to the fixed sirens) necessary for emergency notification, for each of the following areas: Peru, Brownville, Nemaha, Shubert, Rockport, and Watson.
- "3. The licensee shall provide revised route maps to reflect the minimum number of necessary mobile sirens identified in item 2 above.
- "4. The licensee shall develop and implement procedures or methods and provide necessary training to assure the following:
  - (a) that for each area in item 2 above, primary and alternate individuals responsible for emergency notification are identified for each route, this list is to be maintained current;
  - (b) that each primary or alternate individual identified in item 4(a) will receive positive notification of the necessity to warn the public; and

- (c) that no less than the minimum number of mobile siren units for each of the areas identified in item 2 will be continuously available for dispatch.

"5. The licensee shall implement methods to assure that the 32 mobile siren units remain operable, including periodic maintenance and testing."

Items 1, 4, and 5 were to be accomplished by March 20, 1982. For items 2 and 3, involving longer range reanalysis which could not be completed by March 20, 1982, the licensee would indicate his plans for accomplishing these items by that date.

Prior to leaving the site on March 11, 1982, the NRC inspectors verified that the licensee had established interim measures for accomplishing notification in those geographic areas not having a sufficient number of operable mobile sirens.

3. Follow up on Licensee Actions in Response to the Confirmatory Action Letter of March 1<sup>st</sup>, 1982

The licensee's response to the Confirmatory Action Letter was sent to the NRC in a letter dated March 19, 1982 (NPPD: J. M. Pilant to NRC: J. T. Collins). This letter indicates the actions taken to complete items 1, 4, and 5 of the Confirmatory Action Letter. The response indicates that the reanalysis and necessary revisions to complete items 2 and 3 will be made by April 20, 1982.

On March 22 and 23, 1982, two NRC inspectors visited the Cooper Nuclear Station to verify the licensee's corrective actions.

On item 1 of the Confirmatory Action Letter, the licensee determined that the minimum number of units needed at each location (see paragraph 2) was as follows:

Peru	4
Brownville	4
Nemaha	4
Shubert	2
Rockport	7
Watson	4

Total                    25 (yields 7 spare mobile siren units)

This is based on the number of actual routes assigned to each volunteer fire department. (This does not include three sheriff's vehicles which are also required for notification.)

To meet this need, the licensee decided to make at least the above number of units available at the fire house in each location. The licensee's response reported that the following status had been achieved:

Peru	3 units mounted on fire trucks 2 units ready-to-mount and stored in the fire house <sup>+</sup>
Brownville	3 units mounted on fire trucks 2 units ready-to-mount and stored in the fire house <sup>+</sup>
Nemaha	1 unit mounted on a fire truck 4 units ready-to-mount and stored in the fire house <sup>+</sup>
Shubert	2 units ready-to-mount and stored in the fire house <sup>+</sup>
Rockport	7 units mounted on volunteer fire department members' vehicles 3 units ready-to-mount and stored in the fire house <sup>+</sup>
Watson	2 units mounted on fire trucks 3 units ready-to-mount and stored in the fire house <sup>+</sup>

+ Ready-to-mount units are prepared for quick installation on almost any vehicle with battery terminal clips included.

The NRC inspectors visited the fire houses in Nemaha, Shubert, Rockport, and Watson and found that the status of the mobile units was as indicated above. In addition, the licensee has purchased 10 additional mobile units as spares. On March 23, 1982, the NRC inspectors observed that three of these additional units were being installed on fire trucks in the Rockport, Missouri, fire house bringing the total number of units available in that fire house to six. The NRC inspectors observed the operational test of these units performed by a member of the licensee's Quality Assurance Department. The licensee indicated that a seventh unit in a ready-to-mount condition would be provided to the Rockport fire house in the near future. The Rockport volunteer fire department members normally wear pagers in order to be alerted by the Atchison County Sheriff's Department. The NRC inspectors verified this in discussions with two deputy sheriffs from this department.

The licensee's program to provide at least the minimum number of required mobile units at the fire house either mounted on fire trucks or in a ready-to-mount condition satisfies the requirements of items 4(a) and 4(c). A preliminary review of the route maps by the licensee has revealed that the current number of routes (25, as noted above) is conservative and that reevaluation and reassignment of routes may result in a lower number of routes. This will provide additional spare mobile siren units at each location as the licensee indicated the intention to maintain the number of available units at fire houses at its present level (including the seventh unit at Rockport).

To assure that the volunteer firemen receive notification of the necessity to warn the public (item 4(b) of the Confirmatory Action Letter), the licensee has drafted a new Emergency Plan Implementing Procedure 5.7.27 "Early Warning System." This procedure includes the individual procedures for each of the two sheriff departments (Atchison County and Nemaha County) who will be directed by state authorities to activate the emergency warning system, and the procedures for the volunteer fire departments which spell out how they are to carry out their portion of the notification. The NRC inspectors reviewed the draft of procedure 5.7.27 and verified that the volunteer fire departments had received their individual procedures. The NRC inspectors were informed that procedure 5.7.27 would be finalized when comments were received back from the fire departments. In the meantime, it was implemented in its draft form.

The NRC inspectors visited the Nemaha County Sheriff Department with a licensee representative to observe the discussions on the requirements of procedure 5.7.27. Similar discussions were held between the NRC inspectors and deputy sheriffs of the Atchison County Sheriff Department. The NRC inspectors satisfied themselves that these individuals understood their responsibilities for the operation of emergency warning system. The licensee indicated that he would continue to conduct discussions and training for the sheriffs and the volunteer fire departments on the emergency warning system.

To assure continued operability of the mobile units (item 5 of the Confirmatory Action Letter) the licensee has received agreement from the volunteer fire departments that they will do operability checks on the mobile units during their routine meetings (normally monthly). In addition, the licensee's QA staff will perform surveillance testing of each mobile unit every 4 months. The NRC inspectors reviewed records of the testing of all mobile units performed by the QA staff during the week of March 15, and observed the testing of all six units in the Rockport fire house on March 23, 1982. The NRC inspectors also determined that this surveillance is scheduled to be repeated during July 1982 and November 1982. For any inoperable unit discovered by either the firemen or the CNS QA staff, procedures require that Cooper Nuclear Station be notified (emergency planning coordinator during working hours or shift supervisor during off hours). The inoperable unit will then be immediately repaired or replaced from station spares.

#### 4. Exit Interview

At the end of the follow-up visit, the NRC inspectors met with the CNS Plant Superintendent to review the follow-up findings. The NRC inspectors indicated that they had found that the licensee had completed the actions relative to items 1, 4, and 5 of the Confirmatory Action Letter, and that the response to items 2 and 3 would be reviewed when received on April 20, 1982.

U. S. NUCLEAR REGULATORY COMMISSION

REGION IV

APPENDIX B

Report: 50-298/82-09

License: DPR 46

Docket: 50-298

Licensee: Nebraska Public Power District (NPPD)  
Post Office Box 499  
Columbus, Nebraska 68601

Facility Name: Cooper Nuclear Station

Investigation at: Cooper Nuclear Station and NPPD General Offices,  
Columbus, Nebraska

Investigation conducted: March 15-30, 1982

Investigator: Richard A. Matakas 5-18-82  
Richard A. Matakas, Investigator, Region I Date

Inspector: C. A. Hackney 5-17-82  
C. A. Hackney, Emergency Preparedness Analyst Date  
Region IV

Reviewed by: G. L. Madsen 5/17/82  
G. L. Madsen, Chief, Reactor Project Branch 1 Date

Approved by: E. H. Johnson 5/17/82  
E. H. Johnson, Director, Investigation and Date  
Enforcement Staff

Investigation Summary

This investigation was conducted at the request of the Region IV Administrator to determine the circumstances surrounding the licensee's submittal of a letter to the NRC dated February 8, 1982, which contained an apparent material false statement regarding the status of Cooper Nuclear Station's compliance with the requirements of 10 CFR Part 50, Appendix E, Section IV.D.3, and to further determine if the licensee intentionally conveyed the false information in a briefing to the NRC on March 9, 1982.

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PAR-LPAR

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- II. Purpose of Investigation
- III. Background
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  - A. Description of pertinent correspondence and events which led to the initiation of this investigation.
  - B. Contact with volunteer fire departments in communities surrounding the Cooper Nuclear Station.
  - C. Interviews with Nebraska Public Power District Personnel.
- V. Status of Investigation
- VI. Exhibits \*
  - (1) through (21)

\* A copy of all documents identified herein as attachments relating to these allegations are maintained in NRC Region IV office. The above is a listing of documents utilized in this report.

## I. SUMMARY

This investigation was initiated to determine the circumstances surrounding the licensee's submittal of a letter to the NRC dated February 8, 1982, which contained an apparent material false statement regarding the status of the Cooper Nuclear Station's compliance with the requirements of 10 CFR Part 50, Appendix E, Section IV.D.3., and to further determine if the licensee intentionally conveyed the false information in a briefing to the NRC on March 9, 1982. 10 CFR Part 50, Appendix E, Section IV.D.3 states, among other things, that "By February 1, 1982, each nuclear power reactor licensee shall demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ." In order to comply with this commitment, the licensee developed a Cooper Nuclear Station early warning system (EWS) which physically consisted of nine fixed sirens, 32 volunteer firemen using mobile sirens, and six sheriff's cruisers. The licensee sent a February 8, 1982 letter to the NRC confirming that the Cooper Nuclear Station early warning system was installed and was operational. The Licensing Manager verbally reiterated this information to the NRC during a briefing on March 9, 1982. On March 11, 1982, the NRC conducted a special inspection and determined that a number of the mobile siren units had not been installed and were not operational, contrary to the information provided by the licensee, supra.

Interviews with the appropriate volunteer fire department personnel corroborated the special inspection findings. Interviews determined that as of March 9, 1982, 6 of the 32 mobile siren units were still in boxes and that the licensee had knowledge that the mobile siren units were not all completely installed and operational. In one case, a community had its only two units disassembled on the day of the Cooper Nuclear Station Emergency Drill (March 10, 1982). The interviews further indicated that the volunteer fire department personnel had not received the appropriate training or instructions necessary to familiarize them with their emergency response duties. In each instance, those interviewed stated that they were not aware of any written agreement between their community and the licensee regarding commitments to the Cooper Nuclear Station early warning system. One volunteer fire chief indicated that his department's emergency response would be done on a voluntary basis only, doing whatever they could to notify the public, however, he would not assume the responsibility for notification of the public.

Sworn statements from licensee personnel confirmed that the February 8, 1982, Nebraska Public Power District (NPPD) letter to the NRC and the March 9, 1982, NPPD briefing to the NRC both contained material false statements regarding the installation and operational readiness of the Cooper Nuclear Station early warning system. Contents of the aforementioned letter and briefing were based on information from the project's lead engineer, an NPPD employee, who admitted providing the information to upper management, knowing that it was not accurate. Investigation indicates that the actual transmittal of the false information to the NRC was not deliberate on the part of those NPPD

upper management personnel who actually conveyed the information. Interviews indicate that the false information was transmitted as a result of the lack of management controls over the project. Sworn statements from NPPD personnel indicate the project lacked an overall coordinated plan, an adequate commitment tracking system, and a formal project reporting system. Discussions regarding the actual implementation of the system were nonspecific with no written direction, quality assurance, or line of supervision. The NPPD Assistant General Manager stated that the management controls over the project were handled orally and informally. The licensee's internal tracking system entry for the EWS commitment was closed out in July 1981, prior to installation, and testing of the EWS. The project manager stated that he was not assigned or delegated the authority over the other divisions participating in the project and opined that this lack of authority and the lack of manpower in his division was a major cause in the failure of the project. The actual implementation of the project was left up to one individual who reportedly did not receive any written guidance or assistance.



## II. Purpose of Investigation

The purpose of this investigation was to determine the circumstances surrounding the licensee's submittal of a letter to the NRC dated February 8, 1982, which contained an apparent material false statement regarding the status of the Cooper Nuclear Station's compliance with the requirements of 10 CFR Part 50, Appendix E, Section IV.D.3, and to further determine if the licensee intentionally conveyed the false information in a briefing to the NRC on March 9, 1982.

### III. BACKGROUND

On August 19, 1980, the NRC published a revised Emergency Planning Regulation which became effective on November 3, 1980. The rule required licensees to demonstrate, among other things, by July 1, 1981:

" . . . that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ. The design objective shall be to have the capability to essentially complete the initial notification of the public within the plume exposure pathway EPZ within about 15 minutes . . . ."

At the August 11, 1981 meeting, the Commission approved publication of a proposed rule change which would provide an extension of the July 1, 1981, date to February 1, 1982.

10 CFR Part 50, Appendix E, Section IX.D (Notification Procedures) states, "Administrative and physical means for notifying local, state, and Federal officials and Agencies and agreements reached with these officials or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the state and local government agencies within the EPZs."

10 CFR Part 50, Appendix E, Section IV.F (Training) states, "The program to provide for (1) the training of employees and exercising, by periodic drills, of radiation emergency plans to ensure that employees of the licensee are familiar with their specific emergency response duties, and (2) the participation in the training and drills by other persons whose assistance may be needed in the event of a radiation emergency shall be described. This shall include a description of specialized initial training and periodic retraining programs to be provided to each of the following categories of emergency personnel: (a. through i. identified) in addition, a radiological orientation training program shall be made available to local services personnel, e.g., local civil defense, local law enforcement personnel, local news media persons."

The Nebraska Public Power District developed an early warning system for the Cooper Nuclear Station which they described in a letter to the NRC dated June 30, 1981. Item III.A.2 of Attachment 1 to this letter briefly describes the hardware part of the system.

In January 1982, the NRC Region IV, had telephonic contact with the licensee who reported that the Cooper Nuclear Station early warning system was installed and operational. Region IV requested the licensee to submit a written status report on the system. The licensee subsequently responded with a letter dated February 8, 1982, confirming the aforementioned conversation. The letter stated that the early warning system for the Cooper Nuclear Station "has been installed and is operational."

On March 9, 1982, the NRC had a meeting with the NPPD, the subject of which was the CNS EWS. The meeting took place at the Cooper Nuclear Station and attendees included the Station Superintendent, the NPPD Licensing Manager, the NPPD Division Manager, Licensing and Quality Assurance and personnel from the NRC. During the meeting an oral briefing was given to the NRC by the NPPD Licensing Manager, who stated, in effect, that the CNS EWS was installed and operational.

On March 11, 1982, a special inspection was conducted by two NRC Region IV inspectors to verify the status of the CNS EWS. The inspectors determined that five of the mobile siren units, which were a part of the system, were still in shipping cartons and had not been installed and were not operational, contrary to what the licensee had previously reported to the NRC.

On March 15, 1982, this investigation was initiated to determine the circumstances surrounding the apparent false statements made to the NRC by the licensee regarding the operational readiness of the CNS EWS.

## IV. DETAILS

A. DESCRIPTION OF PERTINENT CORRESPONDENCE AND EVENTS WHICH LED TO THE INITIATION OF THIS INVESTIGATION:1. 10 CFR PART 50 - EMERGENCY PLANNING AND PREPAREDNESS FOR PRODUCTION AND UTILIZATION FACILITIES

On August 19, 1980, the NRC published a revised Emergency Planning Regulation which became effective on November 3, 1980. The rule required licensees to demonstrate, among other things, by July 1, 1981:

". . .that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ. The design objective shall be to have the capability to essentially complete the initial notification of the public within the plume exposure pathway EPZ within about 15 minutes . . . ."

At the August 11, 1981 meeting, the Commission approved publication of a proposed rule change which would provide an extension of the July 1, 1981, date to February 1, 1982.

10 CFR Part 50, Appendix E, Section IV.D (Notification Procedures) states, "Administrative and physical means for notifying local, state, and Federal officials and Agencies and agreements reached with these officials and Agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the state and local government agencies within the EPZs."

10 CFR Part 50, Appendix E, Section IV.F (Training) states, "The program to provide for (1) the training of employees and exercising, by periodic drills, of radiation emergency plans to ensure that employees of the licensee are familiar with their specific emergency response duties and; (2) the participation in the training and drills by other persons whose assistance may be needed in the event of a radiation emergency shall be described. This shall include a description of specialized initial training and periodic retraining programs to be provided to each of the following categories of emergency personnel: (a. through i. identified) in addition, a radiological orientation training program shall be made available to local services personnel, e.g., local civil defense, local law enforcement personnel, local news media persons."

2. Exhibit (1) - NPPD GENERAL OFFICE MEMO FROM THE CNS EWS PROJECT MANAGER, INDIVIDUAL D-3, TO THE NPPD LICENSING MANAGER, INDIVIDUAL D-4

This memo, dated June 26, 1981, describes the CNS EWS. It states essentially that the CNS EWS will not be ready for testing until about July 20, 1981.

3. EXHIBIT (2) - NPPD LETTER SIGNED BY THE DIVISION MANAGER OF LICENSING AND QUALITY ASSURANCE, INDIVIDUAL D-2, TO MR. DARREL C. EISENHUT, NRC, DIRECTOR OF LICENSING

This letter, dated June 30, 1981, was drafted by the NPPD Licensing Manager, Individual D-4, in response to Exhibit (1), supra. Item III.A.2. of Attachment 1 to this letter briefly describes the hardware of the CNS EWS, as previously described in Exhibit (1), to the NRC.

4. EXHIBIT (3) - EXECUTIVE SUMMARY OF THE CNS EWS OBTAINED FROM THE NPPD ACTION ITEM TRACKING SYSTEM

The closing date of this document indicates that the CNS early warning siren system was not tracked as an action item after July 1, 1981, even though the system was not completely installed/operational. The tracking system was maintained by the NPPD Licensing Manager, Individual D-4.

5. JANUARY 1982 TELECON BETWEEN REPORTING INSPECTOR AND NPPD PERSONNEL INDIVIDUAL D-4, LICENSING MANAGER, AND INDIVIDUAL D-5, LICENSING ENGINEER

In January 1982, the reporting inspector telephoned Individual D-4, and Individual D-5, who received the call over an NPPD speak phone, regarding the status of the CNS EWS and the December 30, 1981, revision to 10 CFR Part 50, Appendix E, Section IV.D.3., which states: "The four-month period will apply to correction of deficiencies identified during the initial installation and testing of the prompt notification systems as well as those deficiencies discovered thereafter." Reporting inspector stated that during this telephone conversation, NPPD essentially reported that deficiencies noted during an August 1981 test of the CNS EWS were corrected and the EWS was now installed and operational. Reporting inspector stated that NPPD further reported that the volunteer firemen, who were a part of the EWS, knew what they were supposed to do in case of an emergency. Reporting inspector requested that NPPD provide the aforementioned information to the NRC, Region IV, in writing.

6. EXHIBIT (4) - NRC MEMO DATED FEBRUARY 1, 1982 FROM REGION IV ADMINISTRATOR TO MR. BRIAN K. GRIMES, NRC HQ DIRECTOR, DIVISION OF EMERGENCY PREPAREDNESS, OFFICE OF INSPECTION AND ENFORCEMENT

The reporting inspector reported the context of his telephone conversation, supra, to the NRC Region IV Administrator who incorporated the information in Exhibit (4) which states, "Region IV reports indicate that. . .and Cooper have installed and tested their prompt notification systems."

7. EXHIBIT (5) - NPPD LETTER DATED FEBRUARY 8, 1982 FROM INDIVIDUAL D-2, DIVISION MANAGER OF LICENSING AND QUALITY ASSURANCE, TO THE NRC REGION IV ADMINISTRATOR

This letter was a result of reporting inspector's request for NPPD to report, in writing, the status of the CNS EWS as they verbally reported to reporting inspector telephonically in January 1982. The letter confirms that the CNS EWS, as described in Reference 1 to the letter, has been installed and is operational and that noted deficiencies have been corrected. This letter was drafted for Individual D-2's signature by Individual D-5.

(Investigator's Note: NPPD subsequently advised that they inadvertently referenced the January 2, 1981, letter describing a previous CNS EWS that was under consideration during the January 1981 time-frame, and should have referenced the June 30, 1981, letter, Exhibit (2), which correctly describes the current CNS EWS.)

8. EXHIBIT (6) - HANDOUT FROM BRIEFING GIVEN TO THE NRC BY INDIVIDUAL D-4, NPPD LICENSING MANAGER, ON MARCH 9, 1982

On March 9, 1982, the NRC had a meeting with NPPD, the subject of which was the CNS EWS. The meeting took place at the Cooper Nuclear Station and attendees including the Station Superintendent, the NPPD Licensing Manager, the NPPD Manager of Licensing and Quality Assurance, and personnel from the NRC to include the reporting inspector. During the meeting an oral briefing was given to the NRC by Individual D-4, NPPD Licensing Manager, who stated in effect that the CNS EWS was installed and operational. Exhibit (6) is an outline of Individual D-4's briefing.

9. MARCH 11, 1982, REGION IV SPECIAL UNANNOUNCED INSPECTION OF THE OPERABILITY OF THE CNS EWS

On March 11, 1982, a special inspection was conducted by two NRC Region IV inspectors to verify the status of the mobile siren units that had been distributed to volunteer fire departments as indicated in Exhibit (6). The inspectors determined that five of the mobile

siren units were still in shipping cartons and had not been installed and were not operational contrary to what the licensee reported in Exhibits (5) and (6) (Region IV Inspection Report 50-298/82-11 pertains).

B. CONTACT WITH VOLUNTEER FIRE DEPARTMENTS IN COMMUNITIES SURROUNDING THE COOPER NUCLEAR STATION

The following interviews were conducted with volunteer fire department personnel from the communities identified in Exhibit (6) who were the point of contact for NPPD regarding the implementation of the Cooper Nuclear Station early warning system. These individuals are identified as Individuals VF-1 through VF-6 and their respective communities are identified as communities (A) through (F). The interviews determined that 8 of the 32 mobile sirens assigned to volunteer fire departments were not operational until after February 1, 1982, and 5 of the 8 were assembled after the March 10, 1982, CNS EWS exercise. One of the eight mobile units was observed still in its shipping container on March 16, 1982, by reporting investigator, and inspector. All of the individuals interviewed, infra, were the volunteer fire chiefs in their respective communities with the exception of one individual who was identified as a volunteer fireman and the point of contact for NPPD regarding the CNS EWS. None of the individuals interviewed were aware of any written agreements between their communities and NPPD regarding mutual commitments of the CNS EWS.

1. Individual VF-1 of Community (A) was interviewed on March 16-17, 1982, by reporting investigator, and reporting inspector. He reported the status of his mobile sirens as follows: eight sirens mounted on vehicles ready for immediate use; one unit assembled that had been recently removed from a volunteer's vehicle who quit the department; and one unit that was still in its box and had never been assembled. Photographs of the latter two units are depicted in Exhibits 7 through 9. He said about 4 months ago a NPPD representative asked him if he had all of his sirens installed and he told the NPP representative that his department had 9 of the 10 assigned mobile siren units installed. Individual VF-1 said his department had not received any training or written procedures to follow in case of an emergency at the CNS. His signed statement setting forth additional details is Exhibit 10.
2. Individual VF-2 of Community (B) was interviewed on March 17, 1982, by reporting investigator, and reporting inspector. He reported the status of his mobile sirens as follows: two units were installed prior to February 1, 1982; two units were installed the first week of February 1982; and one unit was installed on March 12, 1982. He said he has been the volunteer fire chief in his community for about 7 months and had never met the NPPD CNS EWS representative until March 16, 1982; however, he said he had spoken on the telephone with the representative, Individual D-6, on several occasions. He said that during just about every one of his telephone conversations with

Individual D-6, Individual D-6 inquired as to the status of the mobile units and was told that installation had not been completed. Individual VF-2 stated that his department has not received any training or written procedures to follow in case of an emergency at the CNS and he personally was not aware of any time limitations regarding the emergency notification until the night of March 16, 1982, when he attended a meeting with NPPD personnel who informed him that notification along his department assigned routes had to be accomplished within 15 minutes. His signed statement setting forth additional details is Exhibit 11.

3. Individual VF-3 of Community (C) was interviewed on March 17, 1982 by reporting investigator, and reporting inspector. He reported the status of his mobile sirens as follows: all units operational prior to February 1, 1982. He said he received the mobile siren units from Individual D-6 that his department would receive instructions from the sheriff's office in Auburn, Nebraska, in the event of a CNS emergency. His signed statement setting forth additional details is Exhibit 12.
4. Individual VF-4 of Community (D) was interviewed on March 17, 1982, by reporting investigator and reporting inspector. He reported the status of his mobile sirens as follows: three units operational prior to February 1, 1982, and two units operational during the latter part of the week beginning March 7, 1982. He said that about one and one half months ago he received a route map from Individual D-6 who also inquired as to the operational status of the mobile siren units. Individual VF-4 said he told Individual D-6 that three of the units were installed and operational and he was trying to get volunteers to take the remaining two units. He said that up until March 16, 1982, it was his understanding that in case of an emergency at CNS, his department was supposed to travel the assigned routes, but he did not know what instructions he was supposed to give to the people along the routes. He said he was not aware of any notification time limit and opined that it would take approximately 40 to 45 minutes to make the appropriate notification along his assigned routes. He said his department has not received any training relating to a CNS emergency and to his knowledge there was no written agreement between his department and NPPD setting forth responsibilities in case of such an emergency. Individual VF-4 concluded stating that as far as he was concerned, his department would do what it could to provide assistance in the event of a CNS emergency but his department would not take the responsibility for notification of the public. He signed statement setting forth additional details is Exhibit 13.
5. Individual VF-5 of Community (E) was interviewed on March 17-18, 1982, by reporting investigator, and reporting inspector. He reported the status of his mobile sirens as follows: five units mounted and operational prior to February 1, 1982. He said he was not provided with route maps until about February 15-16, 1982, and



as it stands now, he could not guarantee the availability of the mounted units in case of CNS emergency because some of the units are mounted on vehicles belonging to volunteer personnel who may be away from the area on business. He said the only training that his department has received, that he is aware of, concerned the operation of the stationary siren within his community. His signed statement setting forth additional details is Exhibit 14.

6. Individual VF-6 of Community (F) was interviewed on March 16-17, 1982, by reporting investigator, and reporting inspector. He reported the status of his mobile sirens as follows: both units were put together for operational use shortly after the CNS EWS exercise (March 10, 1981). He identified his NPPD point of contact as Individual D-6 who provided him with the sirens "at least six months ago." He said when Individual D-6 gave him the sirens he (Individual D-6) told him that he would be sending someone out to install them. He said his department had not received any written instructions regarding a CNS emergency and the only instructions that he had received came verbally from Individual D-6 who basically told him that his department was suppose to "tell the people that there was an emergency situation at the plant," if the situation should arise. He said that it was his understanding that the two siren units had recently been put together by NPPD personnel so that the units could be quickly mounted on available vehicles; however, he did not know if the mounting brackets, that were a part of the siren units, would fit available vehicles. Exhibit 15 is a statement that was prepared based on information provided by Individual VF-6; however, VF-6 declined to sign the statement stating he thought it might get him into trouble. The contents of the statement were read to Individual VF-6 which he acknowledged as being truthful and accurate.

#### C. INTERVIEWS WITH NEBRASKA PUBLIC POWER DISTRICT PERSONNEL

The following interviews were conducted with NPPD personnel who were involved with the management control, and the decision making process surrounding the creation and implementation of the Cooper Nuclear Station Early Warning System (Attachment 1 to Exhibit 2 pertains) for compliance with the requirements set forth in 10 CFR Part 50. All of the individuals interviewed, infra, are district headquarters personnel and are referred to as Individuals D-1 through D-6.

1. Individual D-1, NPPD Assistant General Manager, was interviewed by the reporting investigator, and the reporting inspector on March 19, 1982, at NPPD Headquarters. He said that early discussions of the CNS EWS during the above meetings centered mainly around the aspects of hardware that would be needed to implement the plan. He said there were some very general discussions concerning procedures or training, but these items were not discussed in detail during the meetings that he attended. He said that for the most part,

management controls over the project were handled orally and informally as to the progress and implementation of the plan. He said that he had no knowledge concerning the February 8, 1982, letter to the NRC (Exhibit 5) stating that the CNS EWS was installed and operational, until he received his copy of the letter in District distribution. He said that as far as he was concerned, conversations that he had with his subordinates led him to believe that the CNS EWS was installed and operational. His sworn statement setting forth additional details is Exhibit 16.

2. Individual D-2, NPPD Division Manager of Licensing and Quality Assurance, was interviewed by the reporting investigator, and the reporting inspector on March 18, 1982, at NPPD Headquarters. He said he attended meetings during the latter part of 1980, and the first part of 1981 concerning the CNS EWS in order to comply with 10 CFR Part 50 Appendix E. He indicated that these meetings were the basis for a CNS EWS as set forth in Attachment 1 of Exhibit 2. He said that some time in the January 1982 time-frame, he was approached by Individual D-5, NPPD Licensing Engineer, who informed him that NPPD had informed the NRC that the CNS EWS had been installed and was operational and that the NRC had requested written confirmation to that effect. He said as NPPD's representative for all matters involving the NRC, it was his job to reply to the NRC, and he subsequently signed the NPPD correspondence to the NRC, dated February 8, 1982, stating, in effect, that the CNS EWS had been installed and was operational. He said the letter was correct, based on information Individual D-5 had received from the NPPD Engineering Department. Individual D-2 said that based on this information he signed the February 8, 1982, letter (Exhibit 5). He said he did not have his quality assurance people verify the information. He said it was not until sometime later that he realized that the aforementioned letter had referenced a previous EWS system that was under consideration at an earlier date, and that the February 8 letter should have actually referenced a June 30, 1981, NPPD letter (Exhibit 2), Attachment 1 of which correctly described the CNS EWS. He concluded by stating that it was not until the time of the CNS EWS emergency drill that he realized that the CNS EWS was not completely installed and operational. His sworn statement setting forth additional details is Exhibit 17.
3. Individual D-3, NPPD Engineering Manager of Power Projects Group, was interviewed by the reporting investigator, and the reporting inspector on March 19, 1982. He said that after the CNS EWS plan was accepted, there was no discussion, in any of the meetings that he attended, regarding the actual implementation of the mobile units, or relating to training or procedural instructions to the volunteer fire departments; however, he said there was some discussion that these items had to be considered. Individual D-3 said that he was assigned the responsibility of project manager over

the CNS EWS, but he was not assigned or delegated the authority over the other divisions that were participating in the project. He said he subsequently assigned the job of lead project engineer to Individual D-6, and the actual implementation of the project was more or less left up to Individual D-6. Individual D-3 advised that one of the problems with the project was that Individual D-6 was getting instructions from the various divisions and these instructions were not coordinated through him (Individual D-3). He said, on occasion, Individual D-6 did ask for help with the project, but he (Individual D-3) was not able to provide the help due to a shortage of manpower (seven engineers on the District staff). Individual D-3 said he did not ask for assistance from upper management because in the past when he has asked for such assistance, he has not received any. Individual D-3 indicated that this lack of manpower and lack of definition of responsibility and authority was what led to the inaccurate information being related to the NRC regarding the EWS project. He said that Individual D-6 did not provide him with any written status reports regarding the project but his verbal reports led Individual D-3 to believe that Individual D-6 was satisfactorily accomplishing the project. Individual D-3 said that one or two days prior to February 8, 1982, he was informed that Individual D-2 had to respond to the NRC regarding the status of the CNS EWS. He said he spoke to Individual D-6 regarding the response and during the conversation Individual D-6 stated that the mobile sirens "would be installed," indicating that they would be installed very shortly. Individual D-3 said he was not aware of what information Individual D-6 provided to Individual D-2 regarding the response to the NRC, adding that he did not receive his copy of the February 8 letter until after it had been sent out by NPPD. Individual D-3 said that the briefing given to the NRC on March 9, 1982, by Individual D-4, was based on a draft report from Individual D-6 which stated that the CNS EWS was installed and was operational. He said that just prior to the briefing, he attended a meeting with both Individual D-6 and Individual D-4 at which time Individual D-6 verbally reported that the EWS was installed and was operational. Individual D-3's sworn statement setting forth additional details is Exhibit 18.

4. Individual D-4, NPPD Licensing Manager, was interviewed by the reporting investigator, and the reporting inspector on March 30, 1982. He stated that the Cooper Nuclear Station early warning system was an NRC/NPPD action item which he personally tracked on the NPPD action item tracking system (see Exhibit 3). He said his thinking at the time was that when the fixed sirens were in place and the mobile sirens distributed, the commitment was complete. Accordingly, he said when he received an internal NPPD memo from Individual D-3 in June 1981, stating that the fixed sirens had been installed and the 32 mobile units would be distributed by July 10, 1981 (see Exhibit 1), he closed out the action item tracking

system in July 1981, and drafted the June 30, 1981 letter (see Exhibit 2 for Individual D-2's signature, reporting the status of the system in Attachment 1 to the letter, Item III.A.2. He said that prior to March 9, 1982, he was not aware of any written procedures that had been generated by NPPD regarding operational procedures of the 32 mobile siren units in case of an emergency at the CNS. Individual D-4 stated that he did not have any input concerning the content of the February 8, 1982, letter and did not see the letter until he received his copy in NPPD distribution. He said that after he read the February 8 letter, he felt that the CNS EWS was, in fact, installed and would meet the commitment set forth in 10 CFR Part 50, Appendix E. He said that on March 9, 1982, he gave a briefing to the NRC, wherein he stated that the CNS EWS was installed and operational. He said that at the time of the March 9 briefings, he thought he was providing accurate information to the NRC and it was not until 2 days later that he learned that some of the mobile sirens were either still in their boxes or questionable as to their use. His sworn statement setting forth additional details is Exhibit 19.

5. Individual D-5, NPPD Licensing Engineer, was interviewed by the reporting investigator, and the reporting inspector on March 30, 1982. He said that sometime around February 1, 1982, both he and Individual D-4 had a telephone conversation with the reporting inspector concerning the CNS EWS. He said that during the conversation they told the reporting inspector that the CNS EWS was installed, and operational, and that the reporting inspector requested a CNS EWS status report in writing to Region IV. Individual D-5 said he believes he spoke to Individual D-6 on the same day and inquired about the status of the CNS EWS. He said that during the conversation, Individual D-6 indicated to him that the fixed sirens were in place, the mobile sirens were either mounted on volunteer fire department vehicles or they were put together for immediate use, and the volunteer fire department personnel knew what their responsibilities were in case of a CNS emergency. Individual D-5 said he had a conversation with Individual D-7 regarding the written response to the NRC and he (D-5) subsequently drafted the February 8, 1982, letter to the NRC (Exhibit 5) for Individual D-2's signature, stating that the CNS EWS was installed and operational. He said he inadvertently referenced a January 2, 1981, letter which described an earlier considered EWS and he had intended to reference a June 30, 1981, letter (Exhibit 2) which correctly described the CNS EWS in Item III.A.2. He said that as far as he was concerned, at the time he drafted the February 8 letter, the entire CNS EWS was installed, operational, and the volunteer firemen operating the mobile sirens knew their responsibilities. His sworn statement setting forth additional details is Exhibit 20.
6. Individual D-6, NPPD Engineering Technician, was interviewed by the reporting investigator, and the reporting inspector on March 18, 1982,

at NPPD Headquarters. Individual D-6 was an engineering technician assigned as the lead individual for the implementation of the Cooper Nuclear Station early warning system. He stated that he was assigned the task of implementing the Cooper Nuclear Station early warning system by his supervisor, Individual D-3. He said it was sometime between January and June 1981, that it was decided that the Cooper Nuclear Station early warning system would consist of 9 fixed sirens and 32 vehicle mounted mobile sirens operated by personnel belonging to the volunteer fire departments in six communities surrounding the Cooper Nuclear Station. He said at no time was he ever told how to implement the early warning system as to personnel training, emergency procedures, or letters of agreement with the volunteer fire departments. He said the main emphasis of the project was the installation of the hardware. Individual D-6 did not recall the exact circumstances; however, he did recall that some time prior to February 8, 1982, Individual D-5, from NPPD Licensing, approached him and asked him for a report on the status of the Cooper Nuclear Station early warning siren system. Individual D-6 admitted knowing that the aforementioned status report was for a NPPD licensing response to the NRC. He further admitted telling Individual D-5 that the Cooper Nuclear Station early warning system was installed and operational knowing that the information was not accurate. He related that the reason he provided Individual D-5 with inaccurate information was because he was under a lot of pressure and wanted to meet licensing's deadline. Individual D-6 provided a sworn statement (Exhibit 21) setting forth additional details.

## V. STATUS OF INVESTIGATION

This investigation is submitted closed.

## VI. EXHIBITS

- (1) June 26, 1981, NPPD General Office Memo
- (2) June 30, 1981, Letter from the NPPD to the NRC
- (3) Extract from the NPPD Action Item Tracking System RE: THE CNS EWS
- (4) February 1, 1982, Memo from Region IV to Director, Emergency Preparedness Office of I&E
- (5) February 8, 1982, Letter from the NPPD to the NRC
- (6) March 9, 1982, NPPD Briefing Summary Dated March 5, 1982
- (7) Through (9) Photographs Depicting Inoperable Mobile Siren Units Assigned to Community (A)
- (10) Through (15) \*Statements from Volunteer Fire Personnel in Communities (A) Through (F)
- (16) Through (21) \*Sworn Statements from NPPD personnel

\*Identities of all Individuals interviewed have been referred to generically.