



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

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

JUL - 1 1994

Docket: 50-298  
License: DPR-46  
CAL 4-94-06B

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

SUBJECT: CONFIRMATORY ACTION LETTER (REVISION 2)

On May 27, 1994, Confirmatory Action Letter 4-94-06, and on June 16, 1994, Confirmatory Action Letter 4-94-06A were issued to confirm NPPD's commitments to take certain actions. On July 1, 1994, I held a telephone discussion with you for the purpose of amending this confirmatory action letter. As a result of the discussions, Items 4 and 5 were added or changed. Items 1, 2, and 3 were not revised.

1. Perform as-found testing of all 4160- and 480-volt undervoltage devices in the breakers that supply electrical loads directly from the two emergency busses (4160-volt Switchgear Busses 1F and 1G). It is understood that no preconditioning, refurbishment, or other activities will be performed on any breaker or its components prior to the performance of as-found testing of the breakers.
2. Define the design basis for the surveillance testing acceptance criteria for the control room and turbine building ventilation systems and verify that these systems are operable based on testing performed. Perform an additional pressure test of the control room envelope to verify that the established acceptance criteria can be met. Prior to the performance of the control room pressure test, the design basis values for the operating parameters of the ventilation systems in the buildings connected to the control room will be established.
3. Confirm that the discrepancies related to containment penetrations, which were identified by your staff during a walkdown of containment, have been corrected.
4. Confirm that the programs for electrical distribution system surveillance testing and inservice inspection of penetration welds adequately implement the requirements specified in the appropriate NRC regulations, the Technical Specifications, and your commitments, by verifying that each structure, system, or component is properly tested to validate that it can meet its intended design function. In addition,

CERTIFIED MAIL

070027

9407080056 940701  
PDR ADOCK 05000298  
P PDR

JE36 10

JUL - 1 1994

provide the basis for your assurance that the testing programs implemented in other areas of licensed activities adequately implement an acceptable testing program. In addressing your implementation of your testing program, you should also address the resolution of the concerns identified regarding your practice of preconditioning components and systems prior to testing.

5. Prior to restart of the facility, you will attend a meeting in NRC Headquarters offices to discuss the issues identified in Items 1, 2, 3, and 4 (above). Your presentation should include a discussion of the actions you have taken to resolve these problems and the basis for your judgement that the facility is capable of resuming safe operation.

In addition, prior to restart of the facility, provide the NRC Region IV office with a letter that discusses the following: (a) the root cause(s) for defeating the undervoltage trip function in the Motor Control Center N supply breaker; (b) the actions taken to confirm the design basis for the control room and turbine building ventilation systems; (c) the results of all testing that was performed for the issues discussed in Items 1, 2, and 3 (above); (d) the safety significance of all off-normal or discrepant conditions found in Items 1, 2, 3, and 4 (above); (e) the corrective actions that will be taken to prevent recurrence of the installation of devices (i.e., tie wraps, jumpers, blocks, etc.) that will prevent the actuation of safety-system functions and to ensure that the design basis surveillance testing criteria are established and maintained for the facility; (f) the lessons learned by the Cooper Nuclear Station staff in response to the incident involving the undervoltage trip function in the motor control center supply breaker, including the lack of prompt recognition of the potential safety significance; (g) the basis for your determination that the testing programs for electrical distribution system surveillance testing and inservice inspection of penetration welds are technically adequate and complete; and (h) the basis for your assurance that the testing programs for other licensed activities are adequately implemented.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, and 10 CFR 2.204, you are required to:

1. Notify me immediately if your understanding differs from that set forth above.
2. Notify me in writing if for any reason you cannot complete the actions specified above.
3. Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.


JUL - 1 1994

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of the licensee. Nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Action of 1980, Pub. L. No. 96-511.

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

Sincerely,



L. J. Callan  
Regional Administrator

cc:

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

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

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

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

JUL - 1 1994

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

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

Kansas Radiation Control Program Director

JUL - 1 1994

Nebraska Public Power District

-5-

bcc:

DMB IE 36

J. L. Milhoan, DEDR (17 G21)

J. L. Lieberman, D/OE (2) (7 H5)

L. J. Chandler, Asst. GC/OGC (15 B18)

W. T. Russell, D/NRR (12 G18)

RIV Coordinator, OEDO (17 G21)

L. J. Callan, RA

D. D. Chamberlain, AD/DRSS

T. P. Gwynn, D/DRS

A. B. Beach, D/DRP

G. F. Sanborn, EO

W. L. Brown, RC

J. Carson, ORA

RIV File

J. T. Gilliland, PAO

P. H. Harrell, Branch Chief

R. A. Kopriva, Inspector

L. Thomas, DRP (AI File Copy)

AI 94-152I

C:DRP/C <i>[Signature]</i>	EO <i>[Signature]</i>	RC <i>[Signature]</i>	AD:PDIV <i>[Signature]</i>	D:DRP <i>[Signature]</i>
PHHarrell	GFSanborn	WLBrown <i>NOT AVAILABLE</i>	EGAdensan <i>[Signature]</i>	ABBeach
07/01/94	07/01/94	07/01/94	07/1/94	07/1/94

DRA <i>[Signature]</i>	RA <i>[Signature]</i>
JMMontgomery	LJCallan
07/1/94	07/1/94

Nebraska Public Power District

-5-

bcc:

DMB IE 36

J. L. Milhoan, DEDR (17 G21)

J. L. Lieberman, D/OE (2) (7 H5)

L. J. Chandler, Asst. GC/OGC (15 B18)

W. T. Russell, D/NRR (12 G18)

RIV Coordinator, OEDO (17 G21)

L. J. Callan, RA

D. D. Chamberlain, AD/DRSS

T. P. Gwynn, D/DRS

A. B. Beach, D/DRP

G. F. Sanborn, EO

W. L. Brown, RC

J. Carson, ORA

RIV File

J. T. Gilliland, PAO

P. H. Harrell, Branch Chief

R. A. Kopriva, Inspector

L. Thomas, DRP (AI File Copy)

AI 94-1521

C:DRP/C <i>[Signature]</i>	EO <i>[Signature]</i>	RC <i>[Signature]</i>	AD:PDIV <i>[Signature]</i>	D:DRP <i>[Signature]</i>
PHHarrell	GFSanborn	WLBrown <i>NOT AVAILABLE</i>	EGAdensan <i>for</i>	ABBeach
07/01/94	07/01/94	07/01/94	07/1/94	07/1/94

DRA <i>[Signature]</i>	RA <i>[Signature]</i>
JMMontgomery	LJCallan
07/1/94	07/1/94