



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

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

SEP 26 1995

Nebraska Public Power District  
ATTN: Guy R. Horn, Vice President - Nuclear  
1414 15th Street  
Columbus, Nebraska 68601

SUBJECT: NRC INSPECTION REPORT 50-298/95-11 AND NOTICE OF VIOLATION

This refers to the inspection conducted by T. Reis of this office on August 14-17 and September 12-13, 1995, at the Cooper Nuclear Station facility. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection, the findings were discussed with Mr. J. Mueller and those members of your staff identified in the enclosed report.

Areas examined during the inspection included an assessment of the operability of the high pressure coolant injection (HPCI) system and containment integrity following the identification of the potential for waterhammer due to the accumulation of a significant volume of water in the HPCI turbine exhaust piping. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of this inspection, the NRC has determined that one violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation is of concern because it is indicative of your staff's inability to identify and correct a degraded condition that involved water accumulation in the HPCI turbine exhaust piping, which could have challenged the operability of HPCI system and the integrity of the primary containment. Although most of the corrective action errors occurred in the past, there were also current performance issues. The operations department missed at least one recent opportunity to recognize the degraded condition and the engineering staff was not initially aggressive in pursuing the problem when the operations department documented the concern on a condition report.

It was determined that corrective actions taken and analyses performed were supportive of both past and current operability of the HPCI system in that the additional stress imposed upon the affected piping and supports did not result in design allowable stresses being exceeded. Although the conclusions supported operability, the condition clearly constitutes an undesirable challenge to both the integrity of the HPCI turbine exhaust line and primary containment. It is our understanding that your staff also considers significant water accumulation in the HPCI exhaust line to be a deficient condition. During the exit meeting conducted on August 17, 1995, the Site Manager, John Mueller, committed to take actions to eliminate the accumulation of excessive water in the exhaust line and that this action will be completed

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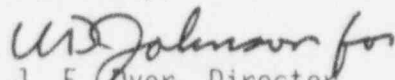
prior to restart of the facility from the fall 1995 refueling outage. It is further understood that, upon return to power from the 1995 refueling outage, water accumulation will be monitored to determine if any additional actions are required above those taken during the outage. If your understanding of this commitment differs from ours, please contact me immediately.

The inspection identified a discrepancy between the allowable stress acceptance criteria utilized in your analyses and the guidance provided in Generic Letter 91-18. The acceptance criteria specified in your analyses was less conservative than that specified in the generic letter. The discrepancy was not an issue for the analyses since the final results were bounded by the criteria specified in the generic letter. The use of the less conservative criteria was discussed with the Office of Nuclear Reactor Regulation and it was determined to be a technically sound basis to support interim operability of piping systems where full Code qualification has been diminished. However, the use of the criteria was not docketed for application at your facility and is inconsistent with both your Plant Unique Analysis Report and the generic letter guidance. NRC Information Notice 95-09 recently alerted licensees to the vulnerability of using unreviewed operability criteria and reiterated the staff's position that it endorsed the generic letter guidance. Therefore, it is requested that your alternate operability criteria be submitted to the Office of Nuclear Reactor Regulation (NRR) for review and approval should you intend to use it for future operability determinations.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

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

Sincerely,



J. E. Oyer, Director  
Division of Reactor Projects

Docket: 50-298  
License: DPR-46

Enclosures:

1. Notice of Violation
2. NRC Inspection Report 50-298/95-11

cc w/enclosures:

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Nebraska Public Power District  
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Licensing & Safety Manager  
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Midwest Power  
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Nebraska Department of Environmental  
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Nemaha County Board of Commissioners  
ATTN: Larry Bohlken, Chairman  
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Jefferson City, Missouri 65102

Kansas Radiation Control Program Director

E-Mail report to D. Nelson (DJN)  
E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE01)

bcc distrib. by RIV:

L. J. Callan

Branch Chief (DRP/C)

MIS System

Branch Chief (DRP/TSS)

RIV File

Robert Jones (RSB:NRR - MS: OWFN 8E23)

Resident Inspector

Leah Tremper (OC/IFDCB, MS: TWFN 9E10)

DRSS-FIPB

Project Engineer (DRP/C)

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<i>9/2/95</i>		<i>9/2/95</i>	<i>9/2/95</i>	<i>9/26/95</i>					

OFFICIAL RECORD COPY

E-Mail report to D. Nelson (DJN)  
E-Mail report to NRR Event Tracking System (IPAS)

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