



Nebraska Public Power District

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NLS950204
October 16, 1995

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

Subject: Exemption Request - Licensed Operator Requalification Exams
Cooper Nuclear Station, Docket No. 50-298, License No. DPR-46

- References:
- 1) Letter (No. NLS950196) to L. J. Callan (USNRC Region IV) from John H. Mueller (NPPD) dated October 5, 1995, "License Operator Requalification Testing Cycle Extension Request"
 - 2) NUREG-1449, Shutdown and Low Power Operations at Commercial Nuclear Power Plants in the United States, September 1993

Gentlemen:

This Letter supersedes Reference 1, in which the Nebraska Public Power District (District) requested an extension of the licensed operator requalification examination cycle for Cooper Nuclear Station (CNS). The District herein requests a one-time exemption, in accordance with the provisions of 10 CFR 55.11, from the two-year schedule requirement contained in 10 CFR 55.59 (a)(2) in order to allow the licensed operator requalification examination cycle for CNS to be rescheduled from November 13, 1995, through December 22, 1995, to February 5, 1996, through March 15, 1996. The District requests NRC review and approval of this exemption request by November 12, 1995. This exemption will apply to the administration of the licensed operator examinations and should remain in effect until such time the examinations are completed (March 15, 1996). The District will continue to provide licensed operator training and conduct additional training, such as plant modification, procedure change, and startup training, during the current outage.

The following discussion provides the District's basis for the exemption request which is limited to the deferral of the licensed operator requalification examination. The exemption request is based on the following points: 1) The continued participation of licensed operators in the ongoing requalification training program; 2) the shutdown risk benefit of assigning the subject personnel to the outage organization; 3) lack of environmental impact; and 4) the lack of undue risk to public health and safety and that granting the exemption is in the public interest. Each of the following paragraphs corresponds to the points identified above.

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The operators at CNS are currently participating and will continue to participate in the ongoing requalification training program, including focusing on outage-related activities, plant modifications and procedure change training. All shift crews have successfully completed the required studies, examinations, and simulator evaluations conducted to date. Granting of the exemption will not result in a reduction in the operators' ability to perform their licensed function.

In NUREG 1449 (Reference 2), the NRC compiled and reviewed information related to shutdown events. The NRC concluded that the majority of the important events involved human error, administrative, other personnel, and procedural errors. This conclusion has been supported in subsequent NRC and industry-sponsored BWR shutdown risk studies. These subsequent studies indicated that loss of offsite power and large draindown events dominate the risk of core damage. The data reviews performed for these subsequent studies support the NRC's conclusion in Reference 2, that the majority of the events are caused by personnel errors. Reference 2 also indicates that the core damage frequency from shutdown events is on the same order of magnitude as at-power risk (i.e., $1E-05/\text{yr}$ to $1E-04/\text{yr}$). Given the relative risk equivalence of these two time periods (at-power operations v.s. shutdown), it is the District's position that assigning the operations and training personnel to the CNS outage organization represents a shutdown risk benefit with regard to plant safety.

Currently, licensed operations and selected training personnel are assigned to the CNS outage organization. The outage duties include, but are not limited to, the following critical areas: Refueling floor SRO, representatives in the outage management organization (Operational concerns, integration of emergent work, etc.), Work Control Center, and MOV testing. In addition to the direct support of the outage organization, the licensed operators are required to support the additional licensed operations workload as a result of outage-related work. These activities include, for example, hanging and removing clearance orders, draining and filling systems, post-maintenance testing, operability runs, and valve/system lineups. Should the exemption not be granted, approximately 20 percent of the licensed operators, during any given week of the outage, would be unavailable to support many of the above described activities. It is the District's position that granting the exemption request would provide a safety enhancement during plant shutdown, and assist in more effective management of shutdown risk. This is consistent with the NRC's conclusion in Reference 2 that operators who understand the problems that could arise during outages are essential in reducing risks associated with outage activities.

Granting this exemption request will involve no significant environmental impact. The exemption will allow a delay in the administration of operator examinations so they will not coincide with the 1995 fall refueling outage. This exemption will not increase the risk of facility

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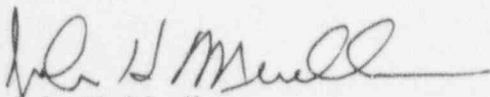
accidents. Thus, post-accident dose consequences would not be greater than previously determined, nor would the exemption result in an increase in radiological plant effluents, nor result in any significant increase in occupational exposure. Likewise, the exemption does not affect non-radiological plant effluents or have any other environmental impact.

Granting of the exemption will not endanger life or property, nor present an undue risk to the public health and safety. This one-time exemption will result in benefit to the public health and safety by providing additional operator support during plant shutdown conditions when risk to safety is dominated by human performance. This one-time exemption is in the public interest in that granting such exemption will accommodate the safe completion of the current refueling outage.

In summary, the District has concluded that the exemption request discussed above, is warranted under the provisions of 10 CFR 55.11. The exemption is requested to be granted by November 12, 1995 and should remain in effect until such time the examinations are completed (March 15, 1996).

If you have any questions, or need additional information, please contact me.

Sincerely,



John H. Mueller
Site Manager

/dnm

cc: Regional Administrator
USNRC Region IV
Arlington, TX

NRC NRR Project Manager
Rockville, MD

NRC Resident Inspector
Cooper Nuclear Station

NPG Distribution

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The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
Reschedule the licensed operator requalification examination cycle from November 13, 1995 through December 22, 1995, to February 5, 1996, through March 15, 1996.	Contingent upon NRC approval of Exemption Request