



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS950205
October 24, 1995

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

Gentlemen:

Subject: Reply to a Notice of Violation;
NRC Inspection Report No. 50-298/95-11;
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: Letter from Mr. J. E. Dyer (USNRC) to Mr. G. R. Horn (NPPD), dated
September 26, 1995, NRC Inspection Report 50-298/95-11 and Notice of
Violation.

This letter, including Attachment 1, constitutes Nebraska Public Power District's (the District) reply to the referenced Notice of Violation (NOV) in accordance with 10 CFR 2.201. Inspection Report 50-298/95-11 documented the results of an NRC inspection conducted from August 14 - 17 and September 12 - 13, 1995, which 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 from accumulated water in the HPCI turbine exhaust piping. The District admits to the violation and has completed all corrective actions that are necessary to return Cooper Nuclear Station (CNS) to full compliance with regard to 10CFR50 Appendix B Criterion XVI.

Should you have any questions concerning this matter, please contact my office.

Sincerely,

J. H. Mueller
Site Manager

Attachment

cc: Regional Administrator
USNRC Region IV

NRC NRR Project Manager
USNRC

NRC Resident Inspector
Cooper Nuclear Station

NPG Distribution

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REPLY TO SEPTEMBER 26, 1995, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted on August 14 - 17 and September 12 - 13, 1995, a violation of NRC requirements was identified. The particular violation and the District's reply are set forth below:

The violation contained in the referenced inspection report cites the following:

"Criterion XVI of Appendix B to 10 CFR Part 50 states, in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances, are promptly identified and corrected.

Contrary to the above, from original licensing of the Cooper Nuclear Station in January 1974 until August 1995 a condition adverse to quality existed in that the high pressure coolant injection turbine exhaust piping was susceptible to water accumulation and created the potential for a waterhammer that could challenge design code allowable margins. The condition adverse to quality was not promptly identified and corrected in the past and recent opportunities to identify and correct the condition were also missed."

Admission or Denial to Violation

The District admits the violation.

Reasons for Violation

The cause for previous failures to resolve this hardware deficiency was due to a lack of effective post-corrective action follow-up. This conclusion is supported by the history of the corrective actions related to this issue, which is described in the body of the Inspection Report. Previous NRC correspondence has documented the inadequacy of the Corrective Action Program that was in place prior to 1994 (NRC Inspection Reports 50-298/92-03, 93-06, 93-17, and 93-202).

More recent opportunities were missed under the improved CNS Corrective Action Program because CNS personnel did not recognize that the recurring existence of water in the HPCI Turbine Exhaust line was a condition adverse to quality. The cause is due to an original design deficiency that was compensated for by a proceduralized "work-around." This was accepted because it appeared to address the symptoms of this condition. In this manner, the potentially adverse system condition became an expected system response, which was considered beneath the threshold for writing a Condition Report. The current station emphasis on not accepting past work arounds contributed to the identification of this condition.

Corrective Steps Taken and the Results Achieved

An Operability Evaluation (OE) was performed for the HPCI System given the worst case accumulation of water in the turbine exhaust line. This OE (with accompanying calculations) concluded that HPCI was within stress operability limits.

The current CNS Corrective Action Program was reviewed to assess the controls that are in place to assure that corrective actions have been effective. The key phases of condition resolution (condition evaluation, action assignments, action completion, and condition closure) involve active management participation with oversight by the Corrective Action Program staff. The specific protocols for

these activities collectively ensure that adverse conditions are effectively resolved. Additionally, the Condition Reporting process has controls to monitor recurring conditions through trending and recurrence reviews prior to the initial disposition of a documented adverse condition.

In the most recent Quality Assurance audit of the CNS Corrective Action Program the conclusion was reached that although weaknesses remain, the program is effectively identifying and resolving station issues. During a recent NRC Team Inspection (NRC Inspection Report 50-298/95-07 dated 8/3/95) a similar conclusion was reached that the CNS Corrective Action Program was, in general, effective.

CNS Management now clearly communicates its expectation that plant problems are to be corrected. Most recently, the following actions have been taken regarding this expectation:

1. CNS memoranda to NPG Managers, Supervisors, and staff have reinforced management's expectation as well as the procedural requirement that Condition Reports be initiated any time an individual is aware of an undesirable or questionable condition at the facility.
2. As discussed in the District's Notice of Violation response to NRC Inspection Report 50-298/95-04, management provided instruction to the Shift Supervisors and Control Room Supervisors that they lower their threshold for writing Condition Reports to include conditions that may have been adequately resolved, but could have broader implications.

Corrective Steps That Will Be Taken to Avoid Further Violations

While the corrective actions taken have sensitized the CNS Staff to this issue, management will remain vigilant in ensuring that an appropriate threshold level for generating condition reports is maintained.

The District has completed the required actions necessary to restore compliance with 10CFR50 Appendix B Criterion XVI. Additionally, as discussed in the Exit Meeting of 8/17/95, the District will take action to reduce or eliminate the accumulation of significant amounts of water in the exhaust line. This action will be completed during the current refueling outage. Upon return to power, water accumulation will be monitored to determine if any additional actions are required above those taken during the outage.

Date When Full Compliance Will Be Achieved

The District is in full compliance with the requirements of 10 CFR 50 Appendix B Criterion XVI with respect to the issue of water in the HPCI Turbine Exhaust line.

Correspondence No: NLS950205

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
The District will take action to reduce or eliminate the accumulation of significant amounts of water in the exhaust line.	During RFO16
Upon return to power, water accumulation will be monitored to determine if any additional actions are required above those taken during the outage.	None