



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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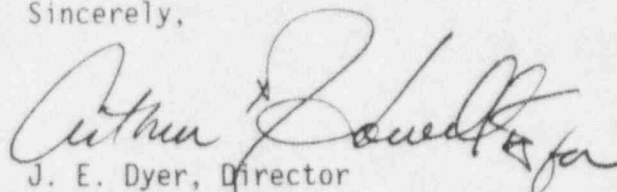
NOV 20 1995

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

Thank you for your letter of October 24, 1995, from Mr. John Mueller, in response to our letter and Notice of Violation dated September 26, 1995. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,



J. E. Dyer, Director
Division of Reactor Projects

Docket: 50-298
License: DPR-46

cc:
Nebraska Public Power District
ATTN: John R. McPhail, General Counsel
P.O. Box 499
Columbus, Nebraska 68602-0499

Nebraska Public Power District
ATTN: John Mueller, Site Manager
P.O. Box 98
Brownville, Nebraska 68321

Nebraska Public Power District
ATTN: Robert C. Godley, Nuclear
Licensing & Safety Manager
P.O. Box 98
Brownville, Nebraska 68321

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Midwest Power
ATTN: R. J. Singer, Manager-Nuclear
907 Walnut Street
P.O. Box 657
Des Moines, Iowa 50303

Lincoln Electric System
ATTN: Mr. Ron Stoddard
11th and O Streets
Lincoln, Nebraska 68508

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

Nebraska Department of Health
ATTN: Cheryl Rogers, LLRW Program Manager
Environmental Protection Section
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509-5007

Nebraska Department of Health
ATTN: Dr. Mark B. Horton, M.S.P.H.
Director
P.O. Box 950070
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

NOV 20 1995

bcc to DMB (IE01)

bcc distrib. by RIV:
L. J. Callan
Branch Chief (DRP/C)
MIS System
Branch Chief (DRP/ S)
RIV File

Resident Inspector
Leah Tremper (OC/LFDCB, MS: TWFN 9E10)
DRSS-FIPB
Project Engineer (DRP/C)

DOCUMENT NAME: R:_CNS\CN511AK.TXR

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NOV 20 1995

bcc to DMB (IE01)

bcc distrib. by RIV:

L. J. Callan

Branch Chief (DRP/C)

MIS System

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Nebraska Public Power District

COOPER NUCLEAR STATION
P.O. BOX 96, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402)825-3811
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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

OCT 31

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

96-0175

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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.

