

~~EXEMPT FROM PUBLIC DISCLOSURE~~

Nebraska Public Power District
Cooper Nuclear Station
P.O. Box 98
Brownville, NE 68321

December 9, 1994

Mr. James Lieberman
Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Lieberman:

The purpose of this letter is to respond to the letter I received from Mr. Joseph R. Gray of your office dated November 10, 1994, which contained a copy of the Demand for Information (DFI) transmitted to the Nebraska Public Power District (NPPD) by letter dated November 10, 1994.

In connection with this matter, I was interviewed by a representative of the NRC's Office of Investigations. Since that time I have had the opportunity to review in greater detail the events during the March 1993 refueling outage, particularly the approval by the Station Operations Review Committee (SORC) on March 9, 1993 of changes to procedures governing reactor pressure vessel (RPV) disassembly. This letter provides the NRC with information that may be in addition to the information I provided during my previous interview. To the best of my recollection and belief, the information provided herein is in all material respects consistent with my previous interview.

Explanation of SORC's Action

I attended the March 9, 1993 SORC meeting as ~~Acting Maintenance Manager~~ (Mike Unruh, who normally attended as the Maintenance Department's representative, was on the night shift at the time). The meeting was split into two sessions. I believe we started about 3:15 p.m., met for some length of time, and reconvened after a brief break about 5:00 p.m.

I recall that, leading up to the meeting, we were at a point of RPV disassembly following cold shutdown and venting. We could not obtain verification of secondary containment integrity necessary to proceed with disassembly. I recall that the wind was a factor preventing a successful test, which would have been I believe -0.25 in. gage pressure. My recollection is that we were

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measuring about -.20 or -.21 in. gage pressure at the time. This is a relatively small difference compared to the criterion; a significant difference would be if we were measuring zero or a positive value of gage pressure. However, we were stopped in the vessel disassembly process as a result.

I believe that someone in the Engineering Department questioned the procedural restriction preventing removal of the RPV head until secondary containment integrity was verified. This was an engineering issue primarily. I recall that the Engineering Department initiated the procedure change process via the PCN form. ~~Jim Flaherty~~ was well prepared at the SORC meeting to support the changes. I reviewed the PCN form. Because I had no technical concerns, I initialed the form as the responsible supervisor for maintenance.

I recall asking ~~Jim Flaherty~~ some questions at the meeting, because I had to be comfortable in my understanding of the changes. I was comfortable with Engineering's assessment. As I recall, ~~John Meacham~~ was at the meeting and he asked some questions. At the meeting SORC discussed whether the procedure changes were justified and what were the requirements that must be met. I believe we looked into the meaning of technical specification requirements and, in my mind, the RPV disassembly loads were not ones that could potentially damage fuel because of their geometry. SORC was aware that the District (it may have been ~~Jim Flaherty~~, I'm not certain) had contacted GE concerning PRC-88-11 and the 1991 procedure changes and that GE representatives distinguished PRC-88-11 loads (about 750 lbs.) from heavy loads associated with RPV disassembly. As I recall, GE used the example of control blade drop as a typical PRC-88-11 concern.

I recollect ~~Jim Flaherty~~ having a lot of papers with him at the meeting. I do not remember whether SORC members received a package of information. ~~Jim~~ had the answers to questions and I thought he adequately covered the issues. I remember SORC discussing NUREG-0612, which addresses heavy loads, though it doesn't really address the issue of secondary containment. I recall not having a concern with the RPV disassembly lifts or rigging, because the issue was whether secondary containment integrity was necessary and whether the loads were ones that could potentially damage irradiated fuel. I felt the geometry of the loads would prevent any damaging of the fuel if dropped, and with the design of the lifting devices and use of safe load paths I wasn't concerned about dropping the loads.

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I recall that ~~Jim Flaherty~~ had referenced two related TS amendments on the PCN form, but I don't recall reviewing these amendments. I do recall, however, reading the technical specifications requirements for secondary containment integrity at the meeting (TS 3.7.C). SORC discussed the surveillance requirement (4.7.C) in relation to the proposed procedure change. We concluded that the 1991 procedure change seemed to exceed the concerns in GE PRC-88-11 and that the proposed change was not in conflict with the technical specifications. I recall specifically that SORC discussed the issue of loads that could potentially damage irradiated fuel, because the term "load" was not precisely defined in the procedure. SORC was comfortable with its interpretation of the technical specification on secondary containment integrity and moving loads. I don't recall looking at the NRC memorandum by Mr. Long at the meeting.

I remember a lot of discussion at the meeting, without strong opposition to the proposed changes. I recall questions coming from ~~John Meacham~~ that resulted in ~~Jim Flaherty~~ doing some more research. I do not recall being influenced in my judgment by ~~John Meacham's~~ involvement. I am not reluctant to speak up at SORC meetings.

On the PCN form at the bottom, the "yes" box was checked indicating that a TS change was involved, and SORC felt this was a mistake. I believe that ~~Jim Flaherty~~ may have pointed this out and I do not recall it was an issue. There was some additional handwritten information on the second page of the form, which was probably written before the meeting (I am uncertain).

Explanation Why NRC Sanctions Are Inappropriate

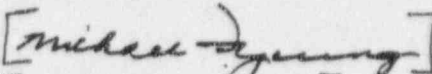
My recollection is strong that the two main issues discussed by SORC at the meeting were (1) safe movement of heavy loads and (2) the timing requirements for verification of secondary containment. I am convinced that SORC acted with sufficient information for a sound decision. In this regard, I do not believe that NRC sanctions against me personally would be appropriate. Any sanctions would have an unwarranted negative impact on my career as a nuclear power professional. ~~Since 1986, I have worked in the Maintenance Department at the Cooper Nuclear Station, most recently as Maintenance Supervisor.~~

I affirm that this letter is true and correct to the best of my knowledge and belief. I hereby request that this letter be

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withheld from placement in the NRC Public Document Room and from disclosure pursuant to 10 C.F.R. § 2.790.

Sincerely,


[Michael F. Young]

Sworn to and subscribed
before me this 9th day of
December, 1994.

Mary Frances Armstrong
Notary Public

My Commission Expires:

Jan 11, 1998

