

~~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. As noted below, my recollection is very limited regarding the approval by the Station Operations Review Committee (SORC) on March 9, 1993 of changes to procedures governing reactor pressure vessel (RPV) disassembly. Nevertheless, I feel a responsibility to respond to your office's request.

Explanation of SORC's Action

I was a member of SORC on March 9, 1993 as ~~Instrumentation and Control Supervisor~~ and approved the subject procedure changes. However, there was no separate I&C technical review of the proposed changes. (I worked for [Robert Brundgart] at the time.) Accordingly, I did not need to initial my concurrence with the changes on the procedure change notice. I recall few details from the March 9th SORC meeting. At the time, I believe that I was not aware of the earlier procedure changes in 1991.

Back in 1993, SORC tended to function as a management meeting without detailed technical review. However, I do not recall how the meeting on March 9 was conducted. Since that time, NPPD has made a number of improvements in the functioning of SORC, including specific training for SORC members. In hindsight, with the additional training I have since received as a member of SORC, I likely would have focussed more intently on the proposed procedure changes on March 9, 1993 even though they were not in my area of expertise. In addition, in hindsight it might have been appropriate for SORC to have specifically addressed [Rick Foust's] (the Assistant Engineering Manager) concerns with the proposed procedure changes, even though I do not recall him identifying any

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[Handwritten signatures]

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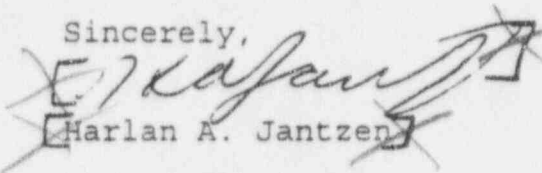
information that necessarily would have changed SORC's decision. From my recollection of the events, including review of related documents, I believe that SORC's decision to approve the procedure changes was appropriate.

Explanation Why NRC Sanctions Are Inappropriate

I believe that no sanctions against me personally are warranted in connection with the November 10, 1994 Demand for Information issued to Nebraska Public Power District. I believe SORC acted appropriately on March 9, 1993 in approving the subject procedure changes. Any sanctions against me would impair my ability to pursue a career in the nuclear power industry, in which I have made a significant investment professionally, including about 22 years in nuclear power with Nebraska Public Power District at the Cooper Nuclear Station as Instrument and Control Supervisor. I have attended a number of related engineering and management related courses over the years, including several technical courses by General Electric Co. pertaining to GE Boiling Water Reactors, N-Reactor operations, instrument maintenance, etc. In my present capacity as Instrument and Control Supervisor, I oversee and direct the work activities of the I&C Department to ensure safe, reliable and efficient operation of Cooper Nuclear Station.

I affirm that this letter is true and correct to the best of my knowledge and belief. I hereby request that this letter be withheld from placement in the NRC Public Document Room and from disclosure pursuant to 10 C.F.R. § 2.790.

Sincerely,


Harlan A. Jantzen

Sworn to and subscribed
before me this 12th day of
December, 1994.

Mary Frances Armstrong
Notary Public

My Commission Expires:

Jan. 11, 1998

