

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. 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.

Explanation of SORC's Action

As ~~Quality Assurance Manager~~ I participated in the March 9, 1993 SORC meeting as a non-voting member (as I had been for the previous 7 years). The ~~QA Manager~~ is the ~~only~~ non-voting member of SORC per the Technical Specifications. I would review proposed changes to procedures from a technical perspective for the ~~QA Department~~ and I concurred with the changes to the RPV disassembly procedures on March 9, 1993, as well as with the 1991 changes to those procedures. I recollect that I was present for the entire SORC meeting on March 9th. I believe it is fair to say that I am known as a very active participant at SORC meetings. I have no reluctance to ask questions or express any disagreement with proposed actions.

My recollection of the March 9, 1993 SORC meeting is sketchy, but I do recall discussion on the issue of what is meant by heavy loads. SORC reviewed the Technical Specifications requirements concerning movement of loads in the secondary containment and maintenance of secondary containment integrity. An issue of interpretation arose, which is not that unusual for SORC because Cooper Nuclear Station has custom technical specifications. To my recollection, this was the first time the issue of prior

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5/8

Mr. James Lieberman
December 9, 1994
Page 2

verification of secondary containment integrity (i.e., prior to RPV disassembly) had arisen. I recall that SORC members were consulting a bound volume of the Technical Specifications during the meeting, and that the guidance of NUREG-0612 concerning movement of heavy loads was discussed.

From my experience, SORC would not have approved the proposed revisions to the procedures if there was actually a conflict with the Technical Specifications. I don't recall disagreement at the meeting, but it is unlikely that SORC would approve a proposed change unless any disagreement was resolved. I am not reluctant to speak up at SORC meetings to ensure that proposed changes are adequately justified.

Explanation Why NRC Sanctions Are Inappropriate

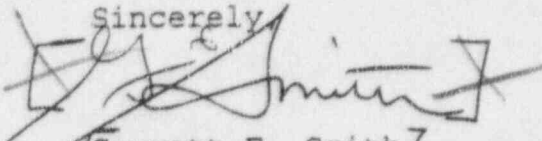
I believe that no sanctions against me personally are warranted in connection with the November 10, 1994 Demand for Information issued to Nebraska Public Power District. Any sanctions against me would impair my ability to pursue a career in the nuclear power industry, in which I have made a significant investment professionally, beginning essentially with the U.S. Navy in 1970. I attended Machinist Mate A School, Nuclear Power School and was trained at the West Milton Nuclear Power Prototype Training Unit where I served as an instructor.

Following an honorable discharge from the U.S. Navy in 1976, I joined Nebraska Public Power District at the Cooper Nuclear Station. Since then, I have held positions of increasing responsibility, including: Engineering Technician (1976-1980); Quality Assurance Specialist (1980-1983); Senior Quality Assurance Specialist (1983-1987); and, most recently, Quality Assurance Manager (1987-Present). As a Quality Assurance Manager, I am currently responsible for directing a staff of 14 personnel to implement and maintain the Audit and Quality Control Programs at Cooper Nuclear Station.

Also, I am a Certified Lead Auditor in accordance with ANSI N45.2.23 (January 1982). I received an Associate's Degree in Social Sciences from Dean Jr. College (1969).

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.

Mr. James Lieberman
December 9, 1994
Page 3

Sincerely

[Garrett E. Smith]

Sworn to and subscribed
before me this 13th day of
December, 1994.

Mary Frances Armstrong
Notary Public

My Commission Expires:

Jan. 11, 1998

