

~~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 by letter dated November 10, 1994.

Since receiving Mr. Gray's letter, I have had the opportunity to review 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. At the time, I held the position of ~~Operations Manager~~ and was also a voting member of SORC. I attended the March 9, 1993 SORC meeting at which time the changes to the RPV disassembly procedures (7.4.4, 7.4.5 and 7.4.6) were approved.

Explanation of SORC's Action

I recall that prior to the SORC meeting on March 9, 1993, there was difficulty in meeting the secondary containment integrity criteria for a couple of days because of high wind conditions. Prior to the SORC meeting, operators were watching the wind. As ~~Operations Manager~~ I was not directly involved with the RPV disassembly, which was delayed because of procedural requirements associated with containment integrity. My responsibilities during the outage primarily began with flooding up, after the steam dryer had been removed from the RPV. My responsibilities included helping to manage the outage and managing the Instrumentation and Control Department.

My recollection of the March 9, 1993 SORC meeting is not very clear at this point. I do recall at the meeting a lot of discussion about what loads could damage fuel in the RPV. There

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was an issue about smaller objects that could be dropped onto the core from above. I recall discussing assurances from GE (SORC members may have received them before the meeting via Tom Black, the GE site representative) that there was no way the head, separator or dryer could damage the fuel in the RPV if dropped during the lift. I remember discussion on NUREG-0612, including perhaps some specific event at another plant, but not many specific details. There was a lot of discussion by SORC on the issue of which loads could damage fuel, such as those that weighed less than a certain amount (say, 750 or 1000 lbs., I don't recall specifically).

I was aware that discussions had been held prior to the meeting, which I was really not part of. I remember also being aware at the meeting that ~~Rick Foust~~ (he did not attend the SORC meeting) had expressed some disagreement with the proposed procedure changes involving RPV disassembly before the meeting. ~~Rick~~ worked for ~~Jim Flaherty~~ at the time and I presume ~~Jim~~ was aware of ~~Rick's~~ views prior to the SORC meeting.

I recall each SORC member having a copy of the proposed change and maybe some other supporting documents, I'm not sure. A typical SORC meeting might cover a number of procedure changes. I don't remember any SORC member disagreeing with the changes to the RPV disassembly procedure. I remember feeling comfortable at the time that only smaller loads (i.e., not the head, dryer or separator) were of concern.

I do not recall having any significant technical concerns with the changes. I have no reluctance speaking up at SORC meetings if I have concerns. Although I was aware that ~~Rick Foust~~ disagreed with the changes, I felt that enough information and research was available for SORC. If I thought otherwise, I wouldn't have hesitated to ask that ~~Foust~~ attend the SORC meeting. If ~~John Meacham~~ was present at the SORC meeting (I don't remember if he was or not), it would not have influenced my judgment. I do not remember having any discussions with ~~Meacham~~ on the procedure changes.

I recall that the PCN form referenced TS Amendments 147 and 150, as a result of ~~Jim Flaherty's~~ preparation for the meeting. As I recall, the yes or no box at the bottom of the form (item number 5) was checked during the meeting. I recall other SORC meetings when the box was checked during the meeting.

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I recall that there was uncertainty at the meeting on when the technical specifications required secondary containment integrity, and that one of the two amendments (147 or 150) either eliminated or clarified the issue that secondary containment integrity was required only for actually handling fuel. I don't remember seeing a memorandum by Mr. Long of the NRC at the meeting. But I do remember someone having previous discussions with Mr. Long on the issue of when secondary containment integrity was a requirement in relation to moving loads, perhaps in connection with amendments to clean up the technical specifications.

I don't recall things dragging on at the meeting. Also, I don't remember feeling pressured to reach a decision. If a dissenting vote arose, even from a non-voting member, the procedure changes would not have been approved by SORC.

Explanation Why NRC Sanctions Are Inappropriate

I respectfully suggest that sanctions against me personally as suggested in the November 10, 1994 Demand for Information would be inappropriate. As explained above, my recollection is that there was a lot of free-and-open discussion both prior to and during the March 9, 1993 SORC meeting. I felt comfortable at the time with SORC's approval of the procedure changes. Any sanctions against me personally would result in personal hardship for me because of my significant investment as a nuclear power professional. I graduated from High School in 1954. Since then, I have accumulated over 33 years of progressively responsible experience in the nuclear power field.

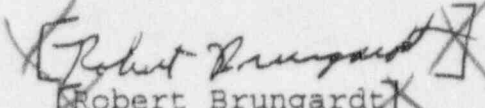
My experience at Cooper Nuclear Station includes Operations Manager (1985 to Present), Operations Supervisor (1983 to 1985), Shift Supervisor (1969 to 1983). I was licensed as a Senior Reactor Operator at Cooper Nuclear Station and previously obtained a Reactor Operator's license at the Hallam Nuclear Power Facility (1963). As Operations Manager, I am responsible for all aspects of operation and maintenance of the plant. Operations, Instrumentation and Control, and Operations Support Group departments report directly to the Operations Manager. Surveillance coordination is a direct responsibility of the Operations Department. I have served as a SORC representative since 1983.

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,


Robert Brungardt

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

Mary Frances Armstrong
Notary Public

My Commission Expires:

Jan. 11, 1998

