Nebraska Public Power District

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NLS960002
January 16, 1996

Director, Office of Enforcement
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

Subject: Reply to a Notice of Violation;
NRC Inspection Report No. 50-298/95-16;
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: Letter from Mr. T. P. Gwynn (USNRC) to Mr. G. R. Horn (NPPD), dated December 15, 1995, NRC Inspection Report 50-298/95-16 and Notice of Violation.

This letter, including Attachment 1, constitutes Nebraska Public Power District's (the District's) reply to the referenced Notice of Violation (NOV) in accordance with 10 CFR 2.201. Inspection Report 50-298/95-16 documented the results of an NRC inspection conducted from November 6-9, 1995, of the radiation protection program during the Cooper Nuclear Station (CNS) 1995 refueling outage. 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 V.

The District notes that an item discussed in Section 2.5.3 of Attachment 2 of the referenced letter requires clarification. The text,

> "... it was stated that they were aware of this [no radiological informational postings in the drywell] and were in the process of purchasing and installing green flashing lights, which would indicate areas of lower dose,"

was the result of a misunderstanding between the inspector and the Radiological Manager. The Radiological Manager was actually referring to placing such devices in the RCA outside the drywell for the stated purpose. We apologize for any confusion in this area.

Should you have any questions concerning this matter, please contact my office.

Sincerely,

J. H. Mueller
Site Manager

CCT

Attachment

IE01
1/1

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC - Cooper Nuclear Station

NPG Distribution

REPLY TO DECEMBER 15, 1995, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from November 6-9, 1995, one violation of NRC requirements was identified. The particular violation and the District's reply are set forth below:

"Criterion V of Appendix B to 10 CFR Part 50 states, in part, that activities affecting quality shall be prescribed by documented procedures, of a type appropriate to the circumstances, and shall be accomplished in accordance with these procedures.

[1] Procedure NTI 03, "Revision to Training Materials," Revision 16.0, states, in part, that revisions which modify the content of training materials shall be documented on a revision/change summary form. Additionally, Procedure NTI 03 states that the lead instructor shall review the draft revisions and changes, initial the revision/change summary form, and forward it to the appropriate nuclear training supervisor for review and approval.

[2] Procedure 9.3.4.8, "Eberline Personnel Contamination Monitor Model PCM-1B," Revision 5, Section 8.1.4, states, "If the monitor alarms after recount, contact Radiological Protection for further evaluation."

[3] Procedure 9.1.6, "Personnel Contamination," Revision 20.2, Section 6.1, states, in part, "An entry on CNS RP-8, PCM Alarm Log, is required when two consecutive PCM-1 alarms occur." Procedure CNS RP-8, "PCM Alarm Log," requires such items to be recorded as: date and time of the contamination, name of the individual and location of the work area, and initial and final contamination, name of the individual and location of the work area, and initial and final contamination levels.

Contrary to the above,

[1] On November 8, 1995, the inspector identified that in September 1995, training material lesson plans and site-specific radiation protection test material were changed without documenting the revisions on a revision/change summary form, and without having the review of the lead instructor and without review and approval of the appropriate nuclear training supervisor.

[2] On November 6, 1995, the inspector identified that two workers failed to follow Procedure 9.3.4.8 and Radiation Worker Training Student Text, in that, the workers did not contact radiation protection after alarming the personnel contamination monitor.

[3] On November 6, 1995, the inspector identified that a radiation protection technician failed to follow Procedure 9.1.6, in that, the technician did not obtain and record information such as: date and time of the contamination, name of the individual and location of the work area, and initial and final contamination levels."

Admission or Denial to Violation

The District admits the violation.

Reasons for Violation

1. This example is attributable to inappropriate assumptions and personnel error in failure to follow procedure. The Contract Radiological Protection (RP) technicians were trained using the current revised RP procedures and updated exam questions. While not presented to the classes, the student text should have been updated in accordance with NTI-03. The instructor was aware of NTI-03 requirements but incorrectly assumed without verifying that there was not an associated student text.

2. This example occurred due to the mind set of the workers and personnel error in failure to follow procedure. The workers were aware of procedural requirements but elected not to notify RP personnel, who were in the process of conducting shift turnover. The workers felt they knew how to respond to the situation since they were involved with PCM alarms several times previously. This was outside of management expectations.

3. This example resulted from personnel error in failing to follow procedure. Prior to the identified example, RP Shop Guide #14 was distributed that stated, "An individual who alarms a PCM two consecutive times is considered contaminated," and "Release criteria and personnel decontamination must be performed in accordance with procedure 9.1.6, 'Personnel Contamination,' excluding Radon suspected contamination." RP personnel incorrectly assumed from RP Shop Guide #14 that if a worker alarmed the PCM once, they could decon the worker and after a successful second attempt the worker would not be considered contaminated.

   This was outside of management expectations and the correct log entries should have been made in accordance with Procedure 9.1.6.

Corrective Steps Taken and the Results Achieved

1. Training supervision counseled the instructor and lead instructor on procedural compliance and attention to detail. Training department personnel were informed of lessons learned from this violation during a training department staff meeting. Further, the contract RP training lesson plan was revised to delete the student text and replace it with the appropriate procedures. No additional actions are required to address this example.

2. Meetings were held with CNS coordinators, turbine floor contract workers, and all RP staff to further communicate CNS expectations regarding RP procedures and work practices. Additional RP staff was added to the turbine floor access/egress point, where this example occurred, to improve RP coverage at shift turnover.

3. Surveys of the turbine deck area were completed to verify contamination levels below the minimum threshold and the PCM alarm log was filled out. The RP staff was counseled on adherence to CNS procedure 9.1.6.

Corrective Steps That Will Be Taken to Avoid Further Violations

The RP staff will conduct interviews with plant workers to ensure worker understanding of radiological procedural controls. Lessons learned from these interviews will be incorporated into lesson plans as appropriate and be reviewed by the General Orientation Training effectiveness review committee.

A CNS General Orientation Training training effectiveness review committee is evaluating the need for additional or enhanced explanations to workers on RP equipment alarms and employee responsibilities concerning these alarms. The RP training effectiveness review committee is evaluating the need for additional training for RP personnel on their responses to alarms.

Date When Full Compliance Will Be Achieved

The District is in full compliance with the requirements of 10 CFR Part 50, Appendix B, Criterion V with respect to the identified procedure violations.

Correspondence No: NLS960002

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
A CNS General Orientation Training training effectiveness review committee is evaluating the need for additional or enhanced explanations on radiological equipment alarms and employee responsibilities concerning these alarms.	
The RP training effectiveness review committee is evaluating the need for additional training for RP personnel on their responses to alarms.	
The RP staff will conduct interviews with plant workers to ensure worker understanding of radiological procedural controls.	