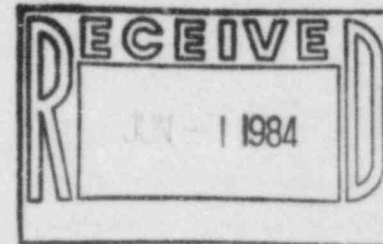


Nebraska Public Power District

COOPER NUCLEAR STATION
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402) 825-3811

CNSS840222

May 24, 1984



Mr. E. H. Johnson, Chief
Reactor Project Branch 1
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/84-06

Dear Mr. Johnson:

This letter is written in response to your letter dated May 4, 1984 transmitting Inspection Report No. 50-298/84-06. Therein you indicated that two of our activities were in violation of NRC requirements.

Following are statements of each violation and our response in accordance with 10 CFR 2.201:

Statement of Violation

High Radiation Area Control

Technical Specification 6.3.4.A requires that each high radiation area (100 mrem/hr or greater) shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring notification and permission of the shift supervisor.

Contrary to the above:

1. An access point to a high radiation area in the radioactive waste solidification/processing area was not barricaded on April 4, 1984.
2. Two station employees working in the radioactive waste solidification area on April 4, 1984, failed to obtain the shift supervisor's permission for several entries (approximately seven) into high radiation areas.

This is a Severity Level IV Violation. (Supplement IV) (298/8406-01)

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Corrective Steps Which Have Been Taken and the Results Achieved

A copy of the Special Work Permit (SWP) for the radwaste drum capping area was posted and the station employees working in the area were instructed to comply with that SWP including obtaining Shift Supervisor permission for entry. An SWP specifically for the drum capping station has since been written and posted at the station and the access to the area has been barricaded in accordance with Procedure 9.1.2.2, Area Posting and Access Control.

Corrective Steps Which Will Be Taken to Avoid Further Violation

Procedure 9.1.2.2, Area Posting and Access Control, will be discussed with all Health Physics personnel with emphasis on the posting and control of high radiation areas.

Date When Full Compliance Will Be Achieved

Cooper Nuclear Station is presently in full compliance. Training on Procedure 9.1.2.2, Area Posting and Access Control, will be completed by June 30, 1984.

Statement of Violation

Radiation Protection Procedure Compliance

Technical Specification 6.3.4 requires that radiation control procedures to be maintained consistent with the requirements of 10 CFR Part 20. Station Health Physics, Procedure 9.1.2.2, requires that personnel entrance into a high radiation area shall require a special work permit. Also, Health Physics Procedure 9.1.1.4 requires the issuance of a special work permit for control of access and work in a high radiation area.

Contrary to the above, routine work operations were conducted on April 4, 1984, in a high radiation area in the radioactive waste solidification processing area, by station personnel without issuance of a special work permit.

This is a Severity Level IV Violation. (Supplement IV) (298/8406-02)

Corrective Steps Which Have Been Taken and the Results Achieved

A Special Work Permit has been written for the drum capping station to control the work at this location. An SWP will be written monthly to control access and work in this high radiation area.

Corrective Steps Which Will Be Taken To Avoid Further Violations

Procedure 9.1.2.2, Area Posting and Access Control, will be discussed with all Health Physics personnel with emphasis on the requirement of a Special Work Permit for high radiation areas.

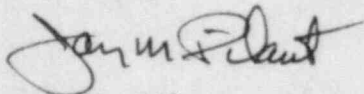
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May 24, 1984
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Date When Full Compliance Will Be Achieved

Cooper Nuclear Station is presently in full compliance. Training on Procedure 9.1.2.2, Area Posting and Access Control, will be completed by June 30, 1984.

If you have any questions regarding this response, please contact me or P. V. Thomason at the site.

Sincerely,



J. M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP:RJM:lb