



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

JUL 10 1992

Docket No. 50-298  
License No. DPR-46


Nebraska Public Power District  
ATTN: Guy R. Horn, Nuclear Power  
Group Manager  
P.O. Box 499  
Columbus, Nebraska 68602-0499

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-298/92-06

Thank you for your letter of June 12, 1992, in response to our letter and Notice of Violation dated May 15, 1992. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

  
A. Bill Beach, Director  
Division of Reactor Projects

cc:  
Nebraska Public Power District  
ATTN: G. D. Watson, General Counsel  
P.O. Box 499  
Columbus, Nebraska 68602-0499

Cooper Nuclear Station  
ATTN: John M. Meacham, Division  
Manager, Nuclear Operations  
P.O. Box 98  
Brownville, Nebraska 68321

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Nebraska Department of Environmental  
Control

ATTN: Randolph Wood, Director  
P.O. Box 98922  
Lincoln, Nebraska 68509-8922

Nemaha County Board of Commissioners

ATTN: Larry Bohlken, Chairman  
Nemaha County Courthouse  
1824 N Street  
Auburn, Nebraska 68305

Nebraska Department of Health

ATTN: Harold Borchert, Director  
Division of Radiological Health  
301 Centennial Mall, South  
P.O. Box 95007  
Lincoln, Nebraska 68509-5007

Kansas Radiation Control Program Director

JUL 10 1992

bcc to DMB (IE01)

bcc distrib. by RIV:

R. D. Martin	Resident Inspector
DRP	Section Chief (DRP/C)
Lisa Shea, RM/ALF, MS: MNBB 4503	MIS System
DRSS-FIPS	RSTS Operator
Project Engineer (DRP/C)	RIV File
DRS	Chief, Technical Support Section
Senior Resident Inspector - River Bend	
Senior Resident Inspector - Fort Calhou	

RIV:C/PSC:DRP	D:DRP			
<sup>RAK</sup> PHHarrell	ABBeach			
7/9/92	7/10/92			

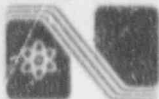
JUL 10 1992

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R. D. Martin	Resident Inspector
DRP	Section Chief (DRP/C)
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Senior Resident Inspector - Fort Calhoun	

RIV:C/PSC:DRP	D:DRP			
PHHarrell:14	ABBeach			
7/7/92	7/10/92			



# Nebraska Public Power District

GENERAL OFFICE  
P.O. BOX 479, COLUMBUS, NEBRASKA 68602-0499  
TELEPHONE (402) 564-8561  
FAX (402) 563-5551

June 12, 1992

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Gentlemen:

Subject: NPPD Response to Inspection Report 50-298/92-06 (Reply to a Notice of Violation)

During an NRC inspection conducted March 8, 1992, through April 18, 1992, one violation was issued for failure to meet the requirements of the Special Work Permit procedure. Following is a statement of the violation and our response thereto in accordance with 10CFR2.201.

### Statement of Violation

Technical Specification 6.3.4 states, in part, that radiation control procedures shall be maintained.

On February 17, 1992, licensee personnel failed to maintain radiation control procedures during entry into a heater bay, a high radiation area, to operate a system, as discussed below:

A. Section VIII.C.1 of Procedure 9.1.1.4, "Special Work Permit," states, in part, that the individual in charge of the job is responsible to notify health physics prior to work start in a special work permit area.

Contrary to the above, a radiation control procedure was not maintained in that operations personnel entered a high radiation area to operate a plant system without prior notification to health physics.

B. Section 8.1.4.1.c of Procedure 9.1.1.1, "Radiation Protection at CNS", states, in part, that the shift supervisor shall ensure that all work to be performed which involves known or potential hazards, has received review by health physics.

Contrary to the above, a radiation control procedure was not maintained in that operations personnel performed work in a high radiation area that involved potential radiological hazards and a review was not performed by health physics prior to initiation of the work.

This is a Severity Level IV violation. (Supplement IV) (298/9206-02)

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#### Reason for Violation

Members of the operating crew entered the heater bay to investigate why the level in feedwater heaters A-3 and A-4 would not control automatically. They discovered the air inlet filter to air operated valve CD-AOV-LCV61A (A-4 heater) had come apart causing the valve to fail open. The Shift Supervisor, after assessing the situation, decided to take manual control of the heater levels by manually manipulating CD-AOV-LCV61A. The crew did not interpret this manipulation to be "Work" as described in Procedure 9.1.4, Protective Clothing (Anti-C).

The Shift Supervisor did not consider this evolution to pose a "Potential Hazard" because the evolution had been performed in the past with minimal personnel exposure and because the heater bay is part of the operator's daily rounds. Therefore, in his view, the health physics reviews called for in Procedure 9.1.1.1, Radiation Protection at CNS, were not required.

In summary, the reasons for the violation were a difference in interpretation of the definition of "Work", and the Shift Supervisor not considering this evolution to pose a "Potential Hazard".

#### Corrective Steps and the Results Achieved

During a routine review of Special Work Permits, health physics noted an unusually high personnel exposure for several operators who made heater bay entries on February 17, 1992. In order to determine the cause of this high exposure, a Radiological Safety Incident Report (RSIR 92-1) was generated and a multidisciplinary Root Cause Task Force was appointed to investigate the incident.

The evaluation of this RSIR resulted in the recommendation of several action items to preclude recurrence. Those items that have been completed are:

- o Review of the existing Shift Supervisor and on-duty Health Physics technician communications technique.
- o The procedural discussion of what constitutes "Work" and what constitutes "Tour and Inspection" has been clarified and moved from Procedure 9.1.4, Protective Clothing (Anti-C), to Procedure 9.1.2.4, Access Control-Radiological.
- o The Division Manager Of Nuclear Operations has publicized "Maintaining a Questioning Attitude" by issuing a letter to all CNS personnel discussing this event and the need for a Questioning Attitude.

In addition, discussions were held with the Shift Supervisor in charge at the time of this incident and the person providing on-shift health physics coverage. The Division Manager Of Nuclear Operations, as a result of these conversations, issued a letter to the Operations Crew enforcing the importance of following procedures. A similar letter was issued to the Radiological Department emphasizing the importance of maintaining a questioning attitude toward unanticipated radiation exposures during plant evolutions.

#### Corrective Steps Which Will Be Taken To Avoid Further Violations

The following actions are in progress:

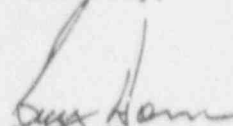
- o A discussion of what constitutes "Work" and what constitutes "Tour and Inspection" is being added to Procedure 2.0.1, Operations Department Policy.
- o The Training Department has been directed to perform the following:
  - A. Incorporate this event into Industry Events training for both the Operations and Radiological Departments, with emphasis on maintaining a "Questioning Attitude".
  - B. Expedite the CNS ALARA program training currently scheduled.
  - C. Upgrade the feedwater heater level control system training program.
- o Senior operations management is in the process of conducting meetings with operations management and supervisory personnel (including shift supervisors) emphasizing the importance and adherence to the questioning attitude concept.

Date Station Operator Compliance Will Be Achieved

NPPD is currently in compliance with the requirements stated in the violation. The remaining corrective steps identified in the "Corrective Steps Which Will Be Taken To Avoid Further Violations" section will be completed by August 31, 1992.

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

Sincerely,



G. R. Horn  
Nuclear Power Group Manager  
Cooper Nuclear Station

GRH:cl-24B

cc: Regional Administrator  
U. S. NRC - Region IV

NRC Resident Inspector  
Cooper Nuclear Station