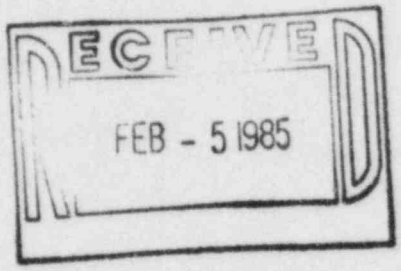
Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499
TELEPHONE (402) 564-8561

CNSS857054

January 29, 1985



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

Subject: NPPD Response to NRC Inspection Report No. 50-298/84-20

Dear Mr. Johnson:

This letter is written in response to your letter dated December 31, 1984 forwarding Inspection Report No. 50-298/84-20. Therein you indicated that one of our activities was in violation of NRC requirements.

The following is the statement of the violation and our response in accordance with 10CFR2.201.

Statement of Violation

Unreviewed Safety Question - Standby Gas Treatment System

10 CFR Part 50.59 permits licensees to make changes to the facilities or procedures as described in the safety analysis report providing the change does not decrease the margin of safety defined in the basis for any technical specification.

Contrary to the above, licensee Procedure 6.3.19.4, "SGT Charcoal Filter Leak and Fan Capacity Test," Revision 10, dated February 17, 1984, paragraph VI.D, states that the flow rate was measured at 1750 cfm during preoperational testing and that this value is now considered the design flow rate. A 10 CFR Part 50.59 analysis was not conducted to determine if the recorded preoperational test value of 1750 cfm decreased the margin of safety of the standby gas treatment system.

The Corrective Steps Which Have Been Taken And The Results Achieved

The design flow rate of the Standby Gas Treatment system at Cooper Nuclear Station was conservatively calculated by Burns & Roe to be 1780 cfm. During preoperational testing, the Standby Gas Treatment system

successfully performed its containment functions with a flow rate of 1750 cfm. Subsequently, it was erroneously assumed that the value of 1750 cfm could be considered design flow and therefore, Surveillance Procedure 6.3.19.4, "SGT Charcoal Leak and Fan Capacity Test", was changed to reflect the assumption without the required 10CFR50.59 Safety Analysis having been performed. Surveillance Procedure 6.3.19.4 has now been changed back to the original design flow value of 1780 cfm.

Corrective Steps Which Will Be Taken To Avoid Further Violations

To avert recurrence, this response will be routed to operations for information purposes.

The Date When Full Compliance Will Be Achieved

Full compliance was achieved January 17, 1985.

If you have any questions regarding this response, please contact me.

Sincerely,

J. M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP:TAW:kg