

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-298/85-05

Construction Permit: DPR-46

Docket: 50-298

Licensee: Nebraska Public Power District (NPPD)  
P.O. Box 499  
Columbus, Nebraska 68601

Facility Name: Cooper Nuclear Station (CNS)

Inspection At: CNS, Brownville, Nebraska  
NPPD, General Office, Columbus, Nebraska

Inspection Conducted: February 4-7, 1985

Inspector: *Russell Wise* 3/1/85  
R. Wise, Radiation Specialist, Facilities  
Radiological Protection Section Date

Approved: *Blaine Murray* 3/1/85  
B. Murray, Chief, Facilities Radiological  
Protection Section Date

*J. P. Jaudon* 3/7/85  
J. P. Jaudon, Chief, Reactor Project Section A Date

Inspection Summary

Inspection Conducted February 4-7, 1985 (Report 50-298/85-05)

Areas Inspected: Routine, unannounced inspection of the licensee's radiological environmental monitoring program including: (1) organization and management controls; (2) training and qualifications; (3) audits; (4) environmental monitoring program implementation; (5) inspection of selected environmental sampling stations; (6) quality assurance (QA) program; (7) contractor activities; and (8) meteorological monitoring program. The inspection involved 32 inspector-hours onsite by one NRC inspector.

Results: Within the areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

NPPD

- \*\*E. N. Sloth, Division Manager, Environmental Affairs
- \*\*L. J. Cooper, Environmental Manager
- \*\*W. R. Luhning, Environmental Supervisor
- \*\*J. Weaver, Nuclear Licensing and Safety Manager
- \*D. A. Whitman, Technical Staff Manager
- \*R. L. Beilke, Chemistry and Health Physics Supervisor
- \*C. R. Goings, Regulatory Compliance Specialist
- G. E. Smith, Senior, Quality Assurance (QA) Specialist
- K. Musil, Health Physics Technician

Others

- \*D. L. DuBois, Resident Inspector, USNRC

\*Denotes those present during the exit interview at CNS on February 6, 1985.

\*\*Denotes those present at the exit interview at the corporate office on February 7, 1985.

2. Licensee Action on Previously Identified Open Items

(Closed) Open Item (298/8304-01): Environmental Program Audits - This item involved the lack of personnel on audit teams with technical expertise in environmental monitoring and the failure to verify that reported results were obtained utilizing accepted industry standards. The licensee hired a QA auditor with an environmental background and conducted internal audits during 1983 and 1984, to assure agreement with industry standards. This action satisfies the NRC concerns. This item is considered closed.

(Closed) Open Item (298/8304-02): Procedures for Participation in Coordinating Agency for Supplier Evaluation (CASE) - This item involved the lack of procedures for participation in CASE and to verify that CASE audits of the analytical contractor are performed to a sufficient depth to indicate compliance with Technical Specifications (TS) applying to the environmental monitoring program. The licensee had issued QA Instruction-16, which outlines specific instructions for utilizing vendors. This action satisfies the NRC concerns. This item is considered closed.

3. Organization and Management Controls

The NRC inspector reviewed the organization and assignment of environmental radiation monitoring program (ERMP) responsibilities to verify agreement with requirements in the TS, commitments in the Updated Safety Analysis Report (USAR), and NPPD Environmental Department Procedures Manual.

a. Organization

The organizational structure of NPPD general office is as described in NRC Inspection Report 50-298/83-04. The current organizational structure and staffing appear sufficient for an adequate ERMP.

b. Management Controls

The NRC inspector reviewed NPPD Environmental Procedure 1, "Environmental Department Procedures Manual," Revision 4, December 19, 1984, for the assignment of responsibilities for management and implementation of the ERMP. The current management control as outlined in this manual appears adequate.

No violations or deviations were identified.

4. Training and Qualifications

The CNS health physics staff is responsible for collection, documentation, and shipment of radiological environmental samples. Training related to the ERMP sampling program is conducted by the health physics department as on-the-job training (OJT). Each health physics technician's training sheet is updated upon completion of the OJT period.

No violations or deviations were identified.

5. Audits

The NRC inspector reviewed the licensee's audit program to verify compliance with TS, Appendix B, Section 5.1.

The NRC inspector reviewed the environmental program audits conducted annually by the CNS QA staff. The following audits were reviewed:

- a. Environmental Monitoring Audit - QAP 900, Audit 83-20, August - September 1983
- b. Environmental Monitoring Audit - QAP 900, Audit 84-16, August 1984

The NRC inspector noted that findings are reviewed by management and appropriate corrective action is taken in a timely manner.

No violations or deviations were identified.

6. Environmental Radiation Monitoring Program Implementation

The NRC inspector reviewed the licensee's ERMP against the requirements contained in TS, Appendix B, Section 4.4, for the period January 1982-December 1983. The licensee had amended (Amendment 89) their radiological effluent TS effective January 1, 1984, to be in agreement with format in NUREG 0472.

The NRC inspector reviewed the annual environmental radiological operating reports for 1982 and 1983, and noted the requirements of the TS had been met. No data for 1984 were as yet available for review at the time of the inspection.

No violations or deviations were identified.

7. Inspection of Environmental Sampling Stations

The NRC inspector reviewed selected sampling stations associated with the environmental radiation monitoring program on February 5, 1985. The following type of stations were inspected: (1) airborne; (2) direct radiation; (3) waterborne, and (4) ingestion (e.g. milk, fish, food products).

The required equipment at the selected sampling stations was in place and operable at the time of the inspection.

No violations or deviations were identified.

8. QA Program

The NPPD Environmental Department Procedures Manual outlines the personnel responsible for management of contractor activities, NPPD activities, and CNS activities.

The manual also contains detailed procedures for sample collection and documentation, packaging and labeling requirements, shipping addresses, and sample locations.

Each analysis report is reviewed to ensure compliance with sampling and analysis schedule. The sample data are reviewed and plotted. Any discrepancies are reviewed with the vendor for appropriate corrective action.

No violations or deviations were identified.

9. Contractor Activities

Analyses of ERMP samples are performed under contract by a commercial vendor. The NRC inspector reviewed the licensee's audit program for contractor activities associated with the ERMP to determine compliance

with TS, Appendix B, Section 5.1. Vendor audits are performed biannually by the NPPD Safety Review and Audit Board. The following audits were reviewed:

- a. Vendor Audit, QA VA 83-09, April 1983
- b. Vendor Audit, QA VA 84-30, November 1984

The NRC inspector noted that findings are reviewed by management and appropriate corrective action is taken in a timely manner.

No violations or deviations were identified.

10. Meteorological Monitoring Program

The NRC inspector reviewed the licensee's meteorological monitoring program to verify compliance with the TS, the USAR, and the recommendations of Regulatory Guide (RG) 1.23 and American National Standards Institute (ANSI) 2.5, September 14, 1984.

The licensee had performed an acceptance test on a new meteorological monitoring system in September 1984, and a 30-day reliability test in October 1984. The NRC inspector reviewed the meteorological tower data recording equipment, calibration procedures, maintenance procedures, and calibration records. The new meteorological system is calibrated semiannually as recommended in RG 1.23.

No violations or deviations were identified.

11. Exit Briefing

The NRC inspector met with NPPD representatives and the NRC Resident Inspector at the CNS site on February 6 and at the corporate offices on February 7, 1985, as indicated in paragraph 1. The NRC inspector summarized the inspection findings.