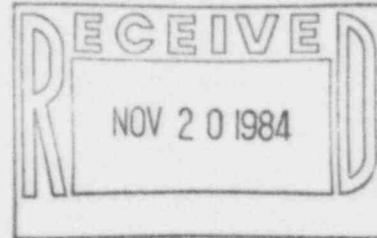


Nebraska Public Power District

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

NLS8400009

November 13, 1984



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

Subject: NPPD Response to IE Inspection Report 50-298/84-15

Dear Mr. Johnson:

This letter is written in response to your letter dated October 19, 1984 transmitting Inspection Report 50-298/84-15. 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 10 CFR 2.201:

Statement of Violation

Failure to Perform Accurately a Part of Technical Specification Required Surveillance Test 6.2.4.1

Cooper Nuclear Station Technical Specification, Section 3.4.C.2 states, "The temperature of the liquid control solution shall be maintained above the curve shown in Figure 3.4.2." CNS Surveillance Procedure 6.2.4.1, Attachment A, page 13 of 15, is performed to ensure that liquid control system solution temperature is within the limits specified on Technical Specification, Figure 3.4.2.

Contrary to the above, on July 18, 1984, licensee personnel entered an incorrect value of liquid control solution temperature onto the blank provided in Surveillance Procedure 6.2.4.1. The licensee did not recognize that the incorrect value of liquid control solution temperature did not meet the requirement of Technical Specification, Figure 3.4.2.

This is a Severity Level IV Violation. (Supplement I.D) (298/8415-01)

Corrective Steps Which Have Been Taken and the Results Achieved

The Operations Supervisor provided verbal instruction to all of the shift personnel involved in making the error. The need to avoid logging errors of

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any kind, particularly on Technical Specification items, was strongly emphasized. Verbal and written guidance was also provided by the Operations Supervisor to all shifts in order to prevent recurrence of this item. The licensed operators have become more conscious of the urgent need to log data accurately and to thoroughly review the data in order to quickly spot any off-normal condition.

Corrective Steps Which Will Be Taken To Avoid Further Violations

Steps are now being taken to revise the form on which the daily Technical Specification requirements are logged. The Control Room Supervisor (SRO qualified), during plant operation, will be required to sign each page of the daily Technical Specification log indicating the logged data complies with the Technical Specification requirements. The Shift Supervisor will also continue to review and sign the daily Technical Specification log indicating his concurrence that all data has been properly recorded, reviewed, and that the data meets the requirements of the Technical Specifications. The log, while in revision, will also be reviewed for human engineering improvements at the same time.

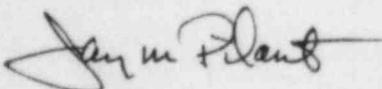
It should be pointed out, however, that the standby liquid control temperature and level are logged every eight hour shift by the reactor building station operator on his log. The station operator log is also reviewed by the Shift Supervisor each eight hour shift. Thus, the data in question was logged correctly three times within the required twenty four hour period. Additionally, this same data was reviewed and verified by the Shift Supervisor's signature to be correct on three occasions on the same day. As it turns out, a simple transposition of the data (temperature vs. level) occurred as it was logged on the daily Technical Specification log at about 0200 that day. It had not been corrected by the Shift Supervisor by about 0800 when the SRI reviewed the data. It is possible that the transposition error would have been detected on the one log (Surveillance Test 6.2.4.1) in a subsequent required shift supervisor review at the end of the same day, thus meeting the daily Technical Specification requirement. It is believed that the corrective action will be adequate to prevent future errors of this nature.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 15, 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:KRW:ya