



# Nebraska Public Power District

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CNSS933505  
January 13, 1993

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

Gentlemen:

Subject: NPPD Response to Inspection Report 50-298/92-22 (Reply to a Notice of Violation)

During an NRC inspection conducted from October 4 through November 14, 1992, certain licensee activities were identified as being in violation of NRC requirements. The first violation identified was the failure to properly secure a high pressure gas cylinder. The second violation was the failure of a designated escort to maintain proper control of an escorted individual. The following is a statement of each violation and our response in accordance with 10CFR2.790.

### Statement of Violation

Title 10 CFR Part 50, Appendix B, Criterion V, states that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Cooper Nuclear Station Procedure 0.7, Revision 8, "Flammable, Combustible, and Chemical Material Control," paragraph 8.3.2.2.c states that, during storage and use, gas cylinders shall be individually secured to a fixed support by a restraint, and paragraph 8.3.2.3 states that use of wheel-mounted carts of approved design are permitted for certain uses of gas cylinders.

Contrary to the above, from approximately April 11 until October 6, 1992, a compressed gas cylinder on the refueling floor, an activity affecting quality, was not accomplished in accordance with approved procedures in that the cylinder was not secured to a fixed support and was not on a wheel-mounted cart of approved design.

This is a Severity Level IV violation (298/9222-01) (Supplement I).

### Reason for Violation

The compressed gas (helium) cylinder had been used to leak test a reactor pressure vessel surveillance specimen shipping cask. This activity was governed by an approved Special Procedure; however, this procedure did not provide specific instructions or precautions for the proper handling of the cylinder.

Station Procedure 0.7, Revision 8, "Flammable, Combustible, and Chemicals Materials Controls," specifies that use of wheel mounted carts of approved design is permitted for certain uses of gas cylinders. Procedure 0.7 also specifies

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that cylinders shall be securely held at the bottom and above 3/4 height and shall be used in the upright position. Even though the top of the cylinder was secured, the bottom of the cylinder was not secured as required by the procedure.

Corrective Steps Taken And The Results Achieved

The cylinder was promptly and properly secured and removed from the Reactor Building. A walkdown of the safety sensitive areas of the plant was also conducted to determine whether a similar condition existed. None were found.

Corrective Steps Which Will Be Taken To Avoid Further Violations

Station procedures will be clarified regarding the proper handling and securing of compressed gas cylinders. Additionally, this violation and the clarified procedural requirements will be discussed at the next scheduled general safety meeting.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by July 1993.

Statement of Violation

Title 10 CFR 50.34(c) requires that each application for a license to operate a production or utilization facility shall include a physical security plan.

The Cooper Nuclear Station Physical Security Plan, Section 1.5.2, requires that escorts exercise and maintain control of visitors at all times.

Cooper Nuclear Station Operations Manual, Plant Services Procedure 1.15, "Visitor/Tour Station Access," Revision 8, Section 4.2.1, states that an escort is responsible to exercise and maintain control of the visitor at all times.

Contrary to the above, on October 5, 1992, an individual with escort responsibility did not exercise and maintain control of a visitor (i.e., an individual not authorized by the licensee to enter protected areas without an escort) while the visitor was working within the protected area in that the escort did not keep the visitor in sight while the visitor was in a room with multiple exits.

This is a Severity Level IV violation (Supplement III) (298/9222-02).

Reason For Violation

The visitor in question was a copy machine repairman, who had been accompanied by an escort to the first floor copy room located in the Cooper Nuclear Station (CNS) Administration Building. The escort duties for the repairman were then transferred to the PBX Operator, who was located directly outside the copy room office access door. It should be noted that the copy room also has a separate hallway access door. The PBX Operator closed the hallway door upon entering the copy room with the visitor and placed a note on the outside of the door indicating that it should be kept shut. During the repair activities, the repairman relocated the copy machine into the center of the copy room. With the machine in this location, the PBX Operator did not have a direct line-of-sight to the repairman.

Although the hallway access door was originally shut and a note had been placed on the door, at some point during the copier repair activity it also had been opened, which could have allowed the repairman to exit without the escort's knowledge.

While on a plant tour, NRC Region IV Inspectors noticed the visiting repairman in the copy room through the open hallway access door. The inspectors approached the repairman and questioned him about his escort, who was not in his direct line-of-sight nor did he have the escort under control. The NRC inspectors promptly reported the situation to Station Security.

Corrective Steps Taken And The Results Achieved

After being made aware of the situation by the NRC inspectors, the PBX Operator immediately re-closed the hallway access door and contacted the office supervisor. Station Security also responded by sending a guard to ensure that the escorting responsibilities were being properly carried out. In addition, the office supervisor recalled the original escort to remain in the copy room until the repair work was completed.

Management counseling was completed with the supervisor and the PBX Operator on the day of the described event to prevent any future recurrences.

Corrective Steps Taken Which Will Be Taken To Avoid Further Violations

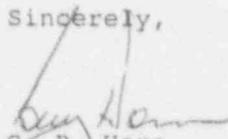
Although the loss of visitor control is an infrequent occurrence (this was the second event in fifteen months), further corrective steps will include a letter to all site personnel stressing the importance of and requirement for line-of-sight control for visitors. Additionally, this event will be included in initial and requalification training for escorts to further emphasize the importance of line-of-sight control for visitors.

Date When Full Compliance Will Be Achieved

The follow-up actions identified above will be completed by February 1993.

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

Sincerely,

  
G. R. Horn

Nuclear Power Group Manager

GRH:JMM:bjs/ya

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

NRC Resident Inspector  
Cooper Nuclear Station