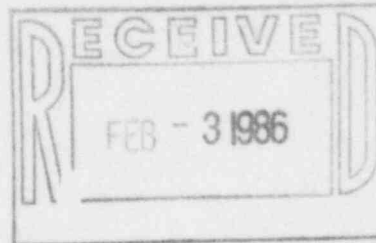


CNSS865518

January 23, 1986



Mr. J. F. Gagliardo, Chief
Reactor Projects Branch
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Subject: NPPD Response to IE Inspection Report No. 50-298/85-26

Dear Mr. Gagliardo:

This letter is written in response to your letter dated December 24, 1985, transmitting Inspection Report No. 50-298/85-26. Therein you indicated that certain of our activities were in violation of NRC requirements.

Following are the statements of the violations and our responses in accordance with 10 CFR 2.201:

1. Statement Of Violation

Waste Gas Radioactivity Monitor Calibrations

Environmental Technical Specification 3.4.3.a.8 requires that "All waste gas monitors shall be calibrated at least quarterly by means of a known radioactive source."

Contrary to the above:

The following gaseous radiation monitors were not calibrated on a quarterly frequency:

1. Radwaste building ventilation monitor was not calibrated with a known radioactive source between the period January 7 through July 10, 1985.
2. The elevated release point (ERP) ventilation monitor was not calibrated with a known radioactive source between the periods February 22 through July 26, 1984, and January 8 through July 9, 1985.

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3. Turbine building ventilation monitor was not calibrated with a known radioactive source between the period May 4 through October 16, 1984.
4. Reactor building ventilation monitor (primary containment) was not calibrated with a known radioactive source in 1984 prior to July 27, 1984, and between the period October 17, 1984, through April 9, 1985.
5. The ERP-GE "A" and "B" monitors were not calibrated with a known radioactive source between the period October 3, 1984, through March 18, 1985.
6. Steam jet air ejector radiation monitor was not calibrated with a known radioactive source between the period August 28, 1984, through July 23, 1985.
7. The control room ventilation monitors RMV-1A, 1B, and 1C were not calibrated with a known radioactive source between the period November 29, 1984, through March 25, 1985.

This is a Severity Level IV violation (Supplement IV) (298/8526-01).

Reason For Violation

This violation resulted from the combination of (1) a deficiency in the gaseous radiation monitor calibration program and (2) a weakness in Station Technical Specifications in that gaseous radiation monitors do not have a clearly defined Limiting Condition for Operation for certain plant operating modes. The deficiency in the calibration program was identified in the existing tracking system for the functional tests and calibrations. This system was not designed to retain the quarterly calibration requirement should the monthly functional test fail. On occasions when the monthly functional test did fail, the quarterly calibration was not performed.

Station Technical Specifications are presently worded such that a quarterly calibration of gaseous radiation monitors is required during all plant operating modes, including modes which should not require all of the monitors to be in operation. Cooper Nuclear Station had incorrectly interpreted the Technical Specifications such that quarterly calibrations of the monitors were not performed when they were not required to be in operation.

Corrective Steps Which Have Been Taken And The Results Achieved

Since this inspection, the Senior Chemistry and Health Physics Specialist and the Lead Chemistry Technician have been individually tracking pertinent quarterly calibration surveillances. Since August 1985, all gaseous radiation monitor quarterly calibration surveillances have been performed satisfactorily.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The Chemistry Surveillance Status Board will be modified to reflect individual gaseous radiation monitor status. This board will also indicate which monitors could not be calibrated due to any unsatisfactory surveillance testing. After corrective maintenance has been performed and a satisfactory surveillance test has been completed, the need for a quarterly surveillance will be evaluated and performed, if necessary.

The Station Technical Specification Limiting Conditions for Operation and surveillance requirements for gaseous radiation monitors will be reviewed and revised as necessary to ensure that explicit guidelines are provided which coordinate surveillance requirements with the various modes of plant operation. In the interim time period between existing surveillance requirements and the proposed review and revision of these requirements, surveillances on gaseous radiation monitors will be performed as required by existing Technical Specifications.

In addition, these corrective steps have been discussed with the Senior Chemistry and Health Physics Specialist and the Chemist to ensure these actions are followed to completion by the full compliance date.

Date When Full Compliance Will Be Achieved

The review and changes to the Technical Specifications will be completed through the normal administrative controls which govern such changes. All other corrective actions discussed will be completed by March 1, 1986.

2. Statement Of Violation

Maintenance And Test Procedure Compliance

Technical Specification 6.3.3 requires that maintenance and test procedures be provided to satisfy routine inspection, preventative maintenance programs, and operating license requirements. Station Instrument and Control (I&C) Procedure 7.5.2.6, Section VI.C requires that Health Physics be contacted prior to performing work in the Transversing Incore Probe (TIP) enclosure.

Contrary to the above, on August 28, 1985, two individuals from the I&C department entered the TIP enclosure to perform work without contacting Health Physics.

This is a Severity Level IV Violation (Supplement IV) (298/8526-02).

Reason For The Violation

On August 28, 1985, two I&C Technicians were required to perform maintenance activities in the Transversing Incore Probe (TIP) enclosure utilizing Station Procedure 7.5.2.6, "TIP Drive Torque Measurements And Core Top Programming". This station procedure required the I&C Technicians to notify the Health Physics Department prior to commencing work in the TIP enclosure. The I&C Technicians failed to contact the Health Physics Department as the procedure stated and this was identified by the NRC Inspector as a violation.

Corrective Steps Which Have Been Taken And The Results Achieved

The I&C Technicians involved in the occurrence were immediately counseled about the need to follow Station Procedure 7.5.2.6 and to notify the Health Physics department prior to commencement of work in the TIP enclosure. Also, all station personnel were made aware of the need to properly follow radiological controls and guidelines in written communication issued by the Division Manager of Nuclear Operations. Both of these steps should ensure that personnel are aware of and follow necessary radiological controls.

Corrective Steps Which Will Be Taken To Avoid Further Violation

Station Procedure 7.5.2.6, "TIP Drive Torque Measurements And Core Top Programming", has been reviewed and a change initiated which requires that Health Physics notification is documented as being completed by a sign off step in the procedure. The I&C Supervisor will speak to I&C personnel about the procedure change and this occurrence emphasizing the need to make necessary Health Physics notification prior to work in the TIP enclosure. These steps should ensure no further violations in this regard occur.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by March 31, 1986.

3. Statement Of Violation

Radiation Protection Procedure Compliance

Technical Specification 6.3.4 requires that radiation control procedures be maintained consistent with the requirements of 10 CFR Part 20. Station Health Physics Procedure 9.1.1.4 requires a special work permit for all jobs which may involve work in the presence of high radiation, in areas in which high levels of radioactive contamination exists, in areas of hazardous airborne radioactivity concentrations, or work involving industrial safety hazards.

Contrary to the above, on August 28, 1985, two individuals entered the TIP enclosure and performed work in a high radiation area and in high airborne radioactivity concentrations without the issuance of a special work permit.

This is a Severity Level IV Violation (Supplement IV) (298/8526-03).

Reason For The Violation

On August 28, 1985, two I&C Technicians were required to perform maintenance activities in the Transversing Incore Probe (TIP) enclosure utilizing Station Procedure 7.5.2.6, "TIP Drive Torque Measurements And Core Top Programming". This station procedure required the I&C Technicians to notify the Health Physics Department prior to commencing work in the TIP enclosure. The I&C Technicians failed to contact the Health Physics Department and, consequently, a Special Work Permit for the TIP enclosure work, as required by Station Procedure 9.1.1.4, "Special Work Permit", was not issued by the Health Physics Department. As identified in the previous violation, the failure of the I&C Technicians to adhere to procedural requirements resulted in this violation.

Corrective Steps Which Have Been Taken And The Results Achieved

As an immediate corrective action at the time of occurrence, the TIP enclosure was evacuated for twenty four (24) hours until radiation levels decreased and a Special Work Permit was issued for the TIP enclosure. The I&C Technicians involved in the occurrence were counseled about the need to follow Station Procedure 7.5.2.6 and to notify Health Physics prior to commencement of work in the TIP enclosure. Also, all station personnel were made aware of the need to properly follow radiological controls and guidelines in written communication issued by the Division Manager of Nuclear Operations.

Corrective Steps Which Will Be Taken To Avoid Further Violation

Station Procedure 7.5.2.6, "TIP Drive Torque Measurements And Core Top Programming", has been reviewed and a change initiated which requires that Health Physics notification is documented as being completed by a sign off step in the procedure. The I&C Supervisor will speak to I&C personnel about the procedure change and this occurrence emphasizing the need to make necessary Health Physics notification prior to work in the TIP enclosure. These steps should ensure no further violations in this regard occur.

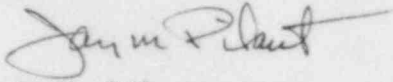
Date When Full Compliance Will Be Achieved

Full compliance will be achieved by March 31, 1986.

J..F. Gagliardo
January 23, 1986
Page 6

If you have any questions regarding this response, please contact me or
G. R. Horn at the site.

Sincerely,



J. M. Pilant
Technical Staff Manager
Nuclear Power Group

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