

APPENDIX C

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-298/88-02 Operating License: DPR-46

Docket: 50-298

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

Facility Name: Cooper Nuclear Station (CNS)

Inspection At: CNS near Brownville, Nebraska

Inspection Conducted: January 4-8, 1988

Inspector: Charles A. Hackney 2-16-88
C. A. Hackney, Emergency Preparedness Date
Specialist

Approved: W. L. Fisher 2-17-88
W. L. Fisher, Chief, Nuclear Materials and Date
Emergency Preparedness Branch

Inspection Summary

Inspection Conducted January 4-8, 1988 (Report 50-298/88-02)

Areas Inspected: Routine, unannounced inspection of knowledge and performance of duties, licensee audits, and operational status of the emergency preparedness program.

Results: Within the areas inspected, two violations and one deviation were identified (paragraphs 3 and 4).

DETAILS1. Persons ContactedLicensee

- *G. Horn, Division Manager, Nuclear Operations
- *J. Sayer, Radiological Manager
- *G. Smith, Quality Assurance Manager
- *G. Reece, Operations Training Supervisor
- *J. Meacham, Senior Manager of Technical Support Services
- *R. Hayden, Emergency Preparedness Coordinator
- *C. Goings-Merrill, Emergency Planning Specialist
- *K. Krumland, Emergency Preparedness Coordinator
- R. Gibson, Audit and Procurement Quality Assurance Supervisor
- C. Goeble, Computer Application Supervisor
- M. Kaul, Shift Supervisor

NRC

- *W. Bennett, Senior Resident Inspector
- *E. Plettner, Resident Inspector

*Denotes attendance at the exit interview.

2. Follow-up on Previously Identified Inspection Findings

(Closed) Open Item 298/8509-14: Revise the Plan and Procedures to Reflect Current Program - The Plan and Procedures had been revised to reflect the current training program.

(Closed) Violation 298/8702-02: Failure to Notify NRC of Organizational Change - The licensee submitted initial changes to the Plan on February 13, 1987, and additional changes to the Plan on May 29, 1987.

3. Knowledge and Performance of Duties (82206)

The NRC inspector reviewed the documents listed below and interviewed licensee representatives to determine whether emergency response personnel understood their emergency response roles and could perform their assigned functions in accordance with the requirements of 10 CFR 50.47(b)(1). Three simulated emergency walk-throughs were conducted with three emergency response personnel.

Documents Reviewed:

- Emergency Plan, Section 5.7.4, Revision 5
- Emergency Plan, Section 5.7.8, Revision 7

Emergency Plan, Section 5.7.9, Revision 9
Emergency Plan, Section 5.7.10, Revision 10
Emergency Plan, Section 5.7.11, Revision 6

Training Documents:

Administrators Guide Introduction with attachments.
Selected emergency response personnel training records.

The NRC inspector determined that a formal emergency training program had been established. The inspector reviewed training records of 13 operations emergency response team members and determined that 8 of the 13 members had not received required annual refresher training. Also, one team member had not received initial emergency preparedness training as required for his emergency assignment. The training record management system appears to have contributed to the personnel training problem. Licensee management had been apprised of a similar problem following the 1987 Emergency Program Quality Assurance (QA) evaluation/audit. The QA finding had not been closed and additional management response had been requested. (298/8802-01)

The NRC inspector observed during the walk-throughs that selected personnel demonstrated adequate understanding of their emergency roles and performed assigned functions satisfactorily.

The NRC inspector discussed the following observations with the licensee during the exit interview:

- The licensee should consider revising the Plan to state that NPPD emergency response personnel will not be assigned an emergency response position prior to having received required emergency training.
- The licensee should consider developing a training matrix to indicate the type of training required for each functional area and individual.
- The licensee should consider revising the Plan to a 12-month requalification training requirement as stated in the training policy statement.
- The licensee should consider reviewing the policy for assigning replacement Emergency Director duties and responsibilities to backup personnel.

4. Licensee Audits (82210)

The NRC inspector reviewed the Quality Assurance (QA) department 12-month emergency program evaluation/audit conducted in March, April, and May 1987 and issued on May 19, 1987. Record review indicated that the evaluation/audit had been performed within the required 12-month period.

The 1987, QA evaluation/audit team observed licensee emergency drills and exercises, and audited training records and offsite emergency plan interfaces. The QA auditors contacted state representatives via telephone and determined that there were no interface problems. However, the NRC inspector noted that the QA department had recommended providing evaluation results to state and local governments, but that the evaluation/audit results had not been made available to the state and local governments by the date of this inspection (298/8802-02).

The NRC inspector reviewed the licensee tracking program for deficiencies and corrective action. The licensee had implemented a tracking system for tracking NRC commitments, violations, and deviations.

On January 6, 1988, the NRC inspector determined from interviews and licensee records that the licensee had not performed mobile siren testing as committed in response to Confirmatory Action Letter dated March 12, 1982, from J. T. Collins, Regional Administrator, NRC Region IV to J. M. Pilant, Division Manager of Licensing and Quality Assurance. The following commitment appeared in a Confirmatory Action Letter Response dated March 19, 1982, from J. M. Pilant, Division Manager of Licensing and Quality Assurance to J. T. Collins, Regional Administrator, NRC Region IV. "Nebraska Public Power District quality assurance group will audit operability of the mobile sirens on a 4-month frequency. If a mobile siren is found inoperable, either by the firemen or by QA, they are to contact Cooper Nuclear Station." The QA auditors performed two complete tests of the sirens in March and August 1982. Then in November 1982 the licensee started to conduct a random sampling of the sirens. This change was a deviation from the licensee's commitment to the NRC. (298/8802-03)

The NRC inspector discussed the following observations with the licensee during the exit interview.

Observations

- ° The licensee should consider adding to the QA audit team a person who has emergency response training and experience.
- ° The licensee should consider sending QA auditors to the individual state offices to compare Plan and Procedure interfaces, rather than conducting the evaluation/audit via telephone.
- ° The licensee should consider having the audit team follow up to ensure that a report has been made available to the state and local governments.

5. Operational Status of the Emergency Preparedness Program (82701)

The NRC inspector interviewed licensee representatives to determine whether emergency response personnel understood their emergency response roles and could perform their assigned functions in accordance with the requirements of 10 CFR 50.47(b)(1).

The NRC inspector selected at random and interviewed three licensee personnel. The selected individuals had received licensee-required training. Additionally, the personnel were aware of their individual responsibilities.

6. Inspector Observation

An NRC inspector observation is a matter discussed with the licensee during the exit interview. Observations are neither violations, deviations, nor unresolved items. They have no specific regulatory requirements, but are suggestions for the licensee's consideration. Observations are identified in paragraphs 3 and 4 of this report.

7. Exit Interview

The NRC inspector met with the NRC resident inspector and licensee representatives denoted in paragraph 1 on January 8, 1988, and summarized the scope and findings of the inspection as presented in this report. The NRC inspector was informed by the licensee that persons on the evening shift of January 7, 1988, had been reviewed to determine emergency preparedness training status. One person was determined not to have received training, but that person was not considered available for response outside his normal duties. Further, six of the previously mentioned nine persons had received required training on January 8, 1988, and the remaining three would receive training when available. Additionally, the licensee stated that other functional emergency response groups would be reviewed to determine that required training had been conducted.