SEP 1 3 1988

In Reply Refer To: Docket: 50-298/88-18

Nebraska Public Power District ATTN: George A. Trevors Division Manager - Nuclear Support P.O. Box 499 Columbus, NE 68601

Gentlemen:

Thank you for your letter of August 16, 1988, in response to our letter and Notice of Deviation dated July 21, 1988. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Deviation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Optoing! Stened By

L. J. Callan, Director Division of Reactor Projects

cc:

Cooper Nuclear Station

ATTN: Guy Horn, Division Manager of Nuclear Operations

P.O. Box 98

Brownville, Nebraska 68321

Kansas Radiation Control Program Director

Nebraska Radiation Control Program Director

RIV:RIT C:TPS RI C:OPS WWW D.DRS D:DRPolitic HFBundy WCSeidle GAPick JEGagliardo JLMilhoan LJCallan 7/15/88 9/15/88 9/15/88 9/15/88

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bcc to DMB (IE-01)

bcc distrib. by RIV:

Section Chief (DRP/C) RPB-DRSS RIV File RSTS Operator DRS

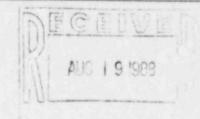
R. D. Martin, RA Lisa Shea, RM/ALF MIS System
Project Engineer, DRP/C
W. Long, NRR Project Manager
DRP



# Nebraska Public Power District

GENERAL OFFICE P.O. BOX 499. COLUMBUS, NEBRASKA 68601-0499 TELEPHONE (402) 564-8561

CNSS886243 August 16, 1988



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

Subject: NPPD Response to Inspection Report 50-298/88-18

Gentlemen:

This letter is written in response to your letter dated July 21, 1988, which transmitted Inspection Report No. 50-298/88-18. Therein you identified one notice of deviation from commitment.

The statement of the deviation and our response thereto in accordance with 10 CFR 2.201 is provided below:

#### A. Notice Of Deviation

## Failure To Identify Qualifications

Section 2.11, "Test Control," of the CNS Quality Assurance Program for Operations Policy Document, Revision 4, states, in part, "These test procedure prerequisites will include . . . performance by appropriately trained personnel . . . ." This document was submitted to and approved by NRC, Region IV.

In deviation from the above, Nuclear Performance Procedure 10.9, Revision 14, "Control Rod Scram Time Evaluation," which was within the scope of Section 2.11 above, did not include a requirement in the prerequisites section for performance by appropriately trained personnel. (298/88-18-01)

## Reason For The Deviation

As shown in Section 2.2, "Quality Assurance Program," of the CNS Quality Assurance Program for Operations Policy Document, the provisions for trained station personnel are as specified in ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel." The requirements of this ANSI standard are met via CNS Procedure 0.17, "Selection and Training of Station Personnel." Prior to this inspection, it was understood that Procedure 0.17 adequately addressed the need for using only trained personnel in performing Nuclear Performance Procedure 10.9.

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Consequently, no specific training requirements were identified in the prerequisite section of NPP 10.9 for personnel performing the procedure.

### Corrective Steps Taken And Results Achieved

The qualifications of the personnel who performed Nuclear Performance Procedure 10.9, Revision 14, "Control Rod Scram Time Evaluation," during the most recent plant startup have been reviewed by the Operations Engineering Supervisor and these personnel have been determined to be acceptable for this procedure (i.e., qualified Station Nuclear Engineers).

### Corrective Steps Which Will Be Taken To Avoid Further Deviations

Nuclear Performance Procedure 10.9 will be revised to include an appropriate prerequisite identifying the qualifications (training) necessary for performance.

## Date When Full Compliance Will Be Achieved

Revisions to Nuclear Performance Procedure 10.9 will be completed by September 30, 1988.

Should you have any questions concerning this matter, please contact my office.

Sincerely,

G. A. Trevors Division Manager

Bewald for

Nuclear Support

GAT:JTS:sg/mh CNS.1602 (COMM18)

cc: V. S. Nuclear Regulatory Commission Regional Office - Region IV

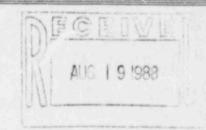
> NRC Resident Inspector Cooper Nuclear Station



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CNSS886243 August 16, 1988 Page 2

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Bewald in

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cc: U. S. Nuclear Regulatory Commission Regional Office - Region IV

> NRC Resident Inspector Cooper Nuclear Station