

Nebraska Public Power District

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May 17, 1988

U. S. Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555

Subject: NPPD Response to IE Inspection Report

No. 50-298/88-03

Gentlemen:

This letter is written in response to your letter dated April 20, 1988, which transmitted IE Inspection Report No. 50-298/88-03. Therein, you indicated that certain of our activities deviate from accepted industry standards/commitments made to the NRC.

Following is the statement of the deviation and our response in accordance with 10CFR2.201:

A. STATEMENT OF DEVIATION

Failure to Frovide Training/Periodic Retraining

IE Bulletin No. 79-19, issued August 10, 1979, requires, in part, that licensees who package low-level radioactive waste for transport and burial provide training and periodic retraining in the Department of Transportation and NRC regulatory requirements, the waste burial licensee requirements, licensee instructions and operating procedures for all personnel involved in the transfer, packaging, and transport of radioactive material. The licensee submitted a response on August 31, 1979, stating that a training/retraining program would be implemented.

In deviation from the above, the NRC inspector determined on March 2, 1988, that all maintenance personnel involved with the handling and packaging of low-level radioactive waste offered for transport had not received periodic retraining since 1985 in the NRC regulatory requirements and the waste burial licensee requirements. (298/8803-01)

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REASON FOR THE VIOLATION

The District concurs with the NRC Inspector's finding that documentation is not available to show that all maintenance personnel, involved in the handling and packaging of low-level radioactive waste, received training in the NRC requirements and waste burial licensee requirements. The reason for this deviation is that during the transfer of training responsibility from various departments to the Training Department, some training records were misplaced and some training commitments were not clearly identified.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A Training Work Request was initiated to produce a training course to address the regulatory and licensee waste burial requirements for personnel involved in handling and packaging of low-level radioactive waste for transport. The Training Department completed work on this course on March 17, 1988. Training of appropriate personnel is scheduled to begin immediately following the current refueling outage. This training is expected to be completed by July 22, 1988.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The course for personnel involved in handling and packaging low-level radioactive waste for transport will be conducted in accordance with their established Requal Training. This will ensure appropriate retraining is conducted.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Initial training will be completed by July 22, 1988. Periodic retraining will follow thereafter.

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

Sincerely,

Division Manager

Kerry

Nuclear Support

GAT: dmr16/1(1A)

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

> NRC Resident Inspector Cooper Nuclear Station