

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-298/86-06

License: DPR-46

Docket: 50-298

Licensee: Nebraska Public Power District
P. O. Box 499
Columbus, Nebraska 68601

Facility Name: Cooper Nuclear Station (CNS)

Inspection At: CNS Site, Brownville, Nebraska

Inspection Conducted: February 3-7, 1986

Inspector:

W. M. McNeill
W. M. McNeill, Project Engineer, Project
Section A, Reactor Projects Branch

3/3/86
Date

Approved:

J. P. Jaudon
J. P. Jaudon, Chief, Project Section A,
Reactor Projects Branch

3/3/86
Date

Inspection Summary

Inspection Conducted February 3-7, 1986 (Report 50-298/86-06)

Areas Inspected: Routine, announced inspection of the calibration program.
Actions taken with regard to previously identified inspection findings. The
inspection involved 36 inspector-hours onsite by one NRC inspector.

Results: Within the area inspected, one violation was identified (failure to
follow the requalification training plan).

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DETAILS1. Persons ContactedNPPD

C. Bean, Preventive Maintenance Specialist
 P. Burrows, Fire Protection Coordinator
 W. E. Crawford, Maintenance Supervisor
 J. E. Dunn, Records Control Specialist
 H. T. Hitch, Senior Staff Engineer
 *G. R. Horn, Nuclear Operations Division Manager
 J. H. Kuttler, Health Physicist
 B. L. Land, Data Coordinator
 E. M. Mace, Plant Engineering Supervisor
 J. M. Meacham, Technical Manager
 P. D. Peters, Records Processor
 D. L. Reeves, Training Manager
 C. Root, Secretary
 T. Sandner, SRO/RO Instructor
 *P. V. Thomason, Senior Nuclear Advisor

*Denotes personnel attending exit meeting.

2. Actions on Previously Identified Inspection Findings

(Closed) Unresolved Item (298/8226-02): Apparent failure to qualify suppliers.

The current approved suppliers list was reviewed and the qualification of a sample of ten suppliers was reviewed in detail. Particular attention was paid to suppliers with more than one facility to assure that the proper facility was approved. When ASME certification or Coordinated Agency for Supplier Evaluation (CASE) register was used for qualification, attention was paid to time frame of qualification. Licensee procedure QAI-16 was also reviewed, and it was noted that a minor revision to this procedure is being made to state that a current ASME register will be used. This item is considered closed.

(Closed) Violation (298/8229-01): Failure to meet record retention requirements in regards to vault facility, record duplication, record storage methods and cabinets used.

The current procedures QAI-7 and ASP-1.9 were reviewed. The vault in use presently was inspected and a sample of various types of records were verified to be filmed and duplicated. A duplicate and single record storage system was found to be in place. Most records are duplicated on microfilm with the exceptions such as preventive maintenance cards, process charts and alarm typer output. The auxiliary vault that had been used was eliminated. It was noted that present file room still does not meet ANSI N45.2.9 - 1974 nor NRC guidance. A replacement facility is planned

and will be constructed in next year which is designed to meet N45.2.9. In regard to environmental monitoring survey records and personnel radiation exposure records, it was found that these records are duplicated on microfilm when they are no longer active. Active records were stored in 1 hour rated cabinets. The NRC inspector found that the duplication of these records was current and up-to-date. The current procedures were found to clearly define the protection required of active and permanent records. Duplicate records are stored offsite at the general offices in Columbus and onsite.

In regard to storage of charts and computer printouts, these records were observed to be bound and stored in boxes in current vault. None were observed to be in process of being stored.

In regard to storage of relay test results, these type records were found to be duplicated on microfilm and the same was true of special test procedures and special procedures. Several recent records were verified to be microfilmed.

This item is considered closed as a violation; however, because full compliance can not be verified until inspection of the new records vault to the requirements of ANSI N45.2.9 - 1974, a new unresolved item is opened (50-298/8606-01).

(Closed) Violation (298/8236-01): Failure to follow the requirements of the approved requalification training plan.

The training records of a sample of ten Senior Reactor Operator (SRO) and Reactor Operator (RO) requalifications were reviewed in detail. Three of these requalification efforts had "low scores" (below 80% and above 70%) in certain sections or areas of the annual requalification examination. Individuals with low scores on their May 1984 requalification exams had been given additional training lectures. One SRO who scored low in administrative procedures, conditions and limitations was given a lecture in September 1985. No quiz or examination was given covering this lecture. On the next requalification in October 1985 this individual again scored low in this area. It should be noted also that the additional training was on the most recent technical specifications changes.

The second individual, a RO, was given four additional training lectures each on different subjects in November and December 1985 on the section that he had scored low (procedures - normal, abnormal, emergency and radiological control). Quizzes or exams were given after only the first three of these lectures. No quiz or exam was given after the last lecture on radiation protection. On the next requalification exam this RO scored 92.8%. This has been identified as a violation (50-298/8606-02). In response to the previous violation, CNS committed to monitor more closely the requalification training to assure that required personnel attend training and take the appropriate examinations over that training. This response was also referenced in the safety evaluation report approving the requalification training plan.

(Closed) Violation (298/8326-04): Failure to follow the procedure on minor design changes.

The design change procedures have been revised for both site and the general office. The new site procedures, which are identified as EP - 3.3 and EP - 3.4, were reviewed. The training records for site and general office personnel were reviewed. New employees are given training in these procedures as part of new employee training as defined in CNS procedure 0.17. The implementation of the design change procedure was verified by inspection of five current design change files. No problems similar to those resulting in the violation were identified. Design changes were approved before implementation; design documents affected were consistently referenced; and appropriate reviews were performed. This item is considered closed.

(Closed) Unresolved Item (298/8402-01): Submittal of a proposal for a records storage facilities, which would meet ANSI and Regulatory Guide requirements and procedures to address records retention.

It was found that the new records storage facilities are planned, and the plans specify ANSI N45.2.9 requirements are to be compiled with for designs and construction. The QA policy document and procedures have been revised to incorporate a commitment to ANSI N45.2.9 - 1974 and Regulatory Guide 1.88. This item is considered closed; however, implementation will be verified with the closure of the previously identified unresolved item on records in this report.

(Closed) Unresolved Item (298/8422-04): Certification that materials were stamped with low stress dies.

A memo has been received which certifies that vendors identification stamping to be low stress. It notes that under certain light conditions the stamping does appear questionable; however, further review and inspection has assured that indeed low stress stampings have been issued. This item is considered closed.

(Closed) Unresolved Item (298/8423-03): Determination of the fire rating and seal capabilities of fiber-frax.

It was verified by inspection of the same area that the material in question has been replaced and both ends of the penetration sealed. Moreover, it was verified that the wall in question is not a fire barrier. This was verified in the fire hazard analysis. This item is considered closed.

3. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether or not the items are acceptable, violations, or deviations. The following unresolved item was discussed in this report:

<u>Paragraph</u>	<u>Item</u>	<u>Subject</u>
2	8606-01	New Vault inspection

4. Exit Meeting

The NRC inspector conducted an exit meeting on February 7, 1986, with the licensee personnel denoted in paragraph 1. The NRC senior resident inspector also attended. At this meeting, the scope and findings of the inspection were summarized.