

APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-298/86-04

License: DPR-46

Docket: 50-298

Licensee: Nebraska Public Power District Company

Facility Name: Cooper Nuclear Station

Inspection At: Cooper Nuclear Station, Brownville, Nebraska

Inspection Conducted: January 21-24, 1986

Inspector: Charles A. Hackney 2-21-86
C. A. Hackney, Emergency Preparedness Analyst Date

Charles G. Hackney 2-21-86
J. B. Baird, Emergency Preparedness Analyst Date

Approved: L A Yandell 3/3/86
L. A. Yandell, Chief, Emergency Preparedness and Safeguards Programs Section Date

Inspection Summary

Inspection Conducted January 21-24, 1985 (Report 50-298/86-04)

Areas Inspected: Routine, unannounced inspection of the licensee's emergency preparedness program. The inspection involved 60 inspector-hours onsite by 2 NRC inspectors.

Results: Within the emergency response areas inspected, one violation was identified (failure to transmit procedure changes to the NRC, paragraph 3).

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DETAILS

1. Persons Contacted

Principal Licensee Personnel

- *G. Horn, Division Manager
- *P. R. Windham, Emergency Planning Coordinator
- C. Goings, Regulatory Compliance Specialist
- *J. Sayer, Senior Technical Radiological Advisor
- D. Reeves, Training Manager
- *V. Wolstenholm, CNS Quality Manager
- R. Black, Operations Supervisor
- P. Thomason, Senior Nuclear Advisor
- P. Balingier, Operations Engineering Supervisor
- J. Sheuerman, Lead Reactor Engineer
- J. Meacham, Technical Manager
- #C. Morgan, General Office Emergency Planning Coordinator

NRC

- *D. L. DuBois, Senior Resident Inspector

The NRC inspectors also held discussions with other station and corporate personnel in the areas of operations, emergency response organization, quality assurance and training.

*Denotes those present at the exit interview.

#Denotes contacted via telephone.

2. Licensee Action on Previous Inspection Findings

(Closed) Open Item (298/8113-39): Primary and backup meteorological systems had been installed and were operational as of December 21, 1983. This item is closed.

(Closed) Deficiency (298/8509-02): Refresher training in the areas of emergency detection, classification, and protective action recommendations was conducted for 46 licensed shift personnel on April 23, 1985. This item is closed.

(Closed) Open Item (298/8509-06): The licensee had revised the Emergency Plan Implementing Procedures (EPIPs) to include highlighted responsibility statements and protective action recommendations and provided color-coded tabs for the EPIP binders. The licensee had also provided volume controlled headsets for intercoms in the emergency response facilities to improve communication capabilities. This item is closed.

(Closed) Open Item (298/8509-10): The NRC inspectors toured the emergency response facilities and observed that the facilities and equipment were in

a state of readiness as indicated in the Emergency Plan and EIPs. This item is closed.

(Closed) Violation (298/8522-01): The NRC inspectors reviewed records of training and qualification for the shift personnel found to be deficient in emergency training, and also reviewed the control room drill scenario used to demonstrate the effectiveness of the training. The NRC inspectors verified that the corrective actions stated in the licensee's letter dated September 30, 1985, had been implemented. This item is closed.

3. Changes to Emergency Preparedness Program

The NRC inspectors reviewed selected sections of the Cooper Nuclear Station (CNS) Emergency Plan, hereafter called the Plan, and EIPs. Special NRC inspector attention was devoted to the EIPs in the area of management procedure review according to 10 CFR 50.54(q). The licensee stated, in writing, that Plan and procedure changes were reviewed to assure compliance with 10 CFR 50.54(q). Licensee emergency response facilities were inspected to determine if any facility changes had occurred and that the changes had been incorporated into the Plan and the EIPs. Recent modifications to the Technical Support Center (TSC) had been incorporated into the EIPs; however, the Plan had not been changed to reflect the modification. The control room, Emergency Operations Facility (EOF), and TSC had installed Safety Parameter Display Systems (SPDS); however, SPDS had not been declared operational. The Operational Support Centers and the EOF were as indicated in the EIPs. A significant revision to the emergency response organization was the change in the station manager's position (EOF director). The NRC inspectors reviewed training records and appropriate EIPs to verify that the new EOFD had received required training, and that revisions to the procedures had been made.

The NRC inspectors reviewed the licensee's EPIP distribution list and receipt records. Persons listed as recipients for EIPs and changes had been sent a copy of recent EPIP changes. Further, most receipt acknowledgement sheets had been returned.

The NRC did not receive any changes that decreased the effectiveness of the Plan or EIPs' for review. Additionally, temporary EPIP's had not been issued since the last inspection.

Review of EPIP change and submittal records to the NRC indicated that 12 EIPs had been revised and not submitted to the NRC in the required 30 days. The EIPs were delinquent from 5 to 32 days past the required 30 day submittal date. This is an apparent violation of 10 CFR 50, Appendix E, which requires that changes to the Emergency Plan and Procedures be submitted to the NRC within 30 days of such changes. (50-298/8604-01). This violation was identified by the licensee and the delinquent procedure revisions were submitted to the NRC on October 31, 1985. The NRC inspectors determined that the licensee did not have a written procedure for submitting EPIP changes to the NRC which would preclude a recurrence of the violation. Further, no procedure existed for distributing EIPs, maintaining records, and requiring return acknowledgement sheets promptly.

The following are observations the NRC inspectors called to the licensee's attention. These observations are neither violations nor unresolved items. These items were recommended for licensee consideration for improvement, but they have no specific regulatory requirement.

- Include modifications to the TSC in the next plan revision.
- Accident flow chart in the Control Room, EOF, and TSC should reflect the latest revision number.
- Emergency Plan transmittal letters should indicate title, section, and revision number in the main body of the letter.
- Develop and implement an EPIP change submittal and record system.

4. Shift Staffing and Augmentation

The NRC inspectors reviewed Section 5 and Table 5-2-2 of the Plan and reviewed the emergency organization personnel list. The NRC inspectors compared Table 5-2-2 of the Plan with NUREG 0654 Table B-1 and determined Table 5-2-2 of the Plan to be adequate. Further, the NRC inspectors discussed shift augmentation with the emergency preparedness coordinator and other selected station personnel.

The licensee had conducted two call in drills, one on November 26, 1985, and one on March 19, 1985. Emergency personnel contacted indicated that emergency response teams would be capable of responding in the recommended 1 hour response time.

The NRC inspectors determined that emergency response personnel were to be contacted via telephone or personal pager in the event of an emergency at the station. The NRC inspectors determined that two persons had discontinued carrying pagers because it appeared that the pagers were not reliable. Other plant personnel carried pagers if they expected to be called.

The following are observations the NRC inspectors called to the licensee's attention. These observations are neither violations nor unresolved items. These items were recommended for licensee consideration for improvement, but they have no specific regulatory requirement.

- Current pager system is partially being used. Management should issue a policy guide, procedure, and roster for key personnel that are assigned a pager and may potentially be notified at any time by the pager. The pager system should be checked to determine operating limits.

No violations or deviations were identified.

5. Licensee Audits

The NRC inspectors noted that the previous Plan Audit included the 10 CFR 50.54(t) evaluation. The previous evaluation was conducted September 24 through September 27, 1984. The most recent evaluation was

conducted March 28 through April 19, 1985. The representatives for the states of Nebraska, Kansas, Iowa, and Missouri were sent copies of the evaluation report on November 27, 1985, for their review and comment. The review contained an evaluation of the interface adequacy with state agencies.

The licensee had not conducted any drills or participated in an exercise during this report period. It should be noted that the licensee requested and received an exemption for conducting the annual exercise during an extended outage.

Deficient areas identified by the auditors had been corrected or were on a tracking system for future follow up.

The NRC inspectors also reviewed the licensee's open action item tracking system and discussed the system with Station personnel to determine if a program had been implemented to identify deficiencies and weaknesses discovered during exercises, and to track the items for corrective actions in accordance with the requirements of 10 CFR 50.47(b)(14) and Appendix E to Part 50, Paragraph IV.F.5. It was noted that all emergency preparedness deficiencies and items for improvement were entered into the tracking system, including deficiencies and weaknesses identified during postexercise critiques. However, it was also noted that not all of the entries were clearly identified as to the classification of the item and whether or not the item resulted from an exercise observation. This made it difficult to separate the deficiencies and weaknesses from improvement items of lesser corrective action priority. The NRC inspectors discussed this with the Emergency Planning Coordinator, and it was noted that changes to the item identifiers were made in the tracking record by the end of the inspection.

The NRC inspectors also determined that corrective actions for items in the tracking system were being taken in an appropriate time frame. This included corrective actions for weaknesses and deficiencies identified during the critique following the previous emergency exercise.

The following are observations the NRC inspectors called to the licensee's attention. These observations are neither violations nor unresolved items. These items were recommended for licensee consideration for improvement, but they have no specific regulatory requirement.

- Delineate weaknesses and deficiencies from other open items in the open action item tracking system and indicate the source of the item, such as exercises, drills, and inspections.
- Utilize personnel with emergency preparedness expertise during the 12-month emergency preparedness program evaluation.

No violations or deviations were identified.

6. Exit Interview

The exit interview was held January 24, 1986, at the Cooper Nuclear Station administration building. The exit interview was conducted by

Mr. C. A. Hackney, Emergency Preparedness Analyst, with Messrs. J. B. Baird and D. L. DuBois, NRC Senior Resident Inspector, in attendance. The licensee was represented by Mr. G. Horn, Division Manager of Nuclear Operations, and members of his staff. The licensee was given a verbal summary of the inspectors findings, observations, and comments.