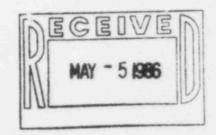
COOPER NUCLEAR STATION
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402) 825-3811

CNSS865718

April 22, 1986

Mr. J. E. Gagliardo, Chief Reactor Projects Branch U. S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive Suite 1000 Arlington, Texas 76011



Subject: NPPD Response to IE Inspection Report No. 50-298/86-02

Dear Mr. Gagliardo:

This letter is written in response to your letter dated March 28, 1986, transmitting Inspection Report No. 50-298/86-02. Therein you indicated that one of our activities was in violation of NRC requirements.

The following is the statement of the violation and our response in accordance with 10 CFR 2.201:

Statement of Violation

Inadequate Procedure Implementing Regulations

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented procedures and accomplished in accordance with these procedures.

10 CFR Part 50.54(m) requires that:

- A senior operator be present in the control room at all times except when the unit is in cold shutdown
- ° A senior operator be present in the control room during refueling
- A licensed operator or a senior operator be present at the controls at all times when the unit is in a mode other than cold shutdown

Contrary to the above, licensee Procedure 2.0.3, which specifies operator requirements, did not require that:

A senior operator be present in the control room at all times except when the unit is in cold shutdown

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- A senior operator be present in the control room during refueling
- A licensed operator or senior operator be present at the controls at all times when the unit is in a mode other than shutdown

This is a Several Level V violation (Supplement I. E.) (8602-01).

Response to Alleged Violation

The District does not admit to the alleged violation (8602-01), as written. Procedure 2.0.3, Revision 1 (attached), adequately addresses 10 CFR Part 50.54(m) requirements.

Corrective Steps Which Will Be Taken

In order to prevent reoccurrence of this NRC concern, the District will review and revise, if necessary, Procedure 2.0.3 to more clearly define 10 CFR Part 50.54(m) requirements.

If you have any questions regarding this response, please contact me or G. R. Horn at the site.

Sincerely,

J. M. Pilant

Technical Staff Manager Nuclear Power Group

JMP:GRH:RB:ya

Attachment