

DEC 2 1988

In Reply Refer To:  
Docket: 50-298/88-20

Nebraska Public Power District  
ATTN: George A. Trevors  
Division Manager - Nuclear Support  
P.O. Box 499  
Columbus, NE 68602-0499

Gentlemen:

Thank you for your letter of November 21, 1988, in response to our letter and Notice of Violation dated October 21, 1988. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. 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,

*Original Signed By*  
A. B. BEACH

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  
bcc to DMB (IE-01)

RIV:PSC *df*  
GLMadsen;df  
12/1/88

C:PSC *df*  
GLConstable  
12/2/88

D:DMO  
L:Callan  
12/2/88

IE01

bcc distrib. by RIV:

RRI  
Section Chief (DRP/C)  
RPB-DRSS  
RIV File  
RSTS Operator  
P. O'Connor, NRR Project Manager (MS: 13-D-18)

R. D. Martin, RA  
Lisa Shea, RM/ALF  
MIS System  
Project Engineer, DRP/C  
DRP  
DRS

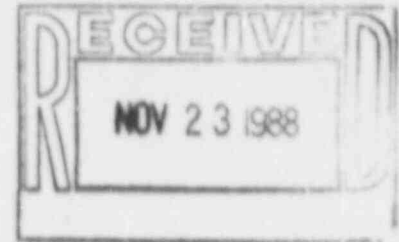


# Nebraska Public Power District

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

CNSS883222

November 21, 1988



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

Gentlemen:

Subject: NPPD Response to Inspection Report 50-298/88-28

This letter is written in response to your letter dated October 21, 1988, transmitting Inspection Report 50-298/88-28. Therein you indicated that certain of our activities were in violation of NRC requirements.

Following is a statement of the violation and our response in accordance with 10CFR2.201.

## Statement of Violation

### Failure to Document Actions per Procedure

10 CFR 50, Appendix B, Criterion V, and the licensee's approved Quality Assurance Plan, require that activities shall be accomplished in accordance with approved instructions, procedures, and drawings. Nuclear Performance Procedure 10.27, "Cask IF-300 Handling and Shipping," Revision 11, dated August 11, 1988, requires sign-offs in steps G.6, J.2, and J.5, of the procedure.

Contrary to the above, on September 20, 1988, steps G.6, J.2, and J.5 of Nuclear Performance Procedure 10.27 were not signed off even though those steps had been completed on September 19, 1988.

This is a Severity Level V violation. (Supplement 1) (298/8828-01)

### Reason For the Violation

This violation occurred as the result of a procedural inadequacy in that Nuclear Performance Procedure 10.27 did not clearly specify that the deficient steps required signatures prior to proceeding with subsequent steps in the procedure. It should be noted that the actions directed by steps G.6, J.2 and J.5 were actually performed, however, the steps were not signed at the time of performance. A verbal concurrence did exist between the responsible individuals prior to proceeding beyond these steps.

IC-88/851-2821700478 ZPB

Corrective Steps Which Have Been Taken and The Results Achieved

Signatures were obtained for steps G.2, J.2 and J.5 in the subject Nuclear Performance Procedure 10.27 "Cask IF-3000 Handling and Shipping". This occurrence and the required corrective action have been discussed with Maintenance Department personnel who are qualified as floor supervisors for Cooper Nuclear Station spent fuel shipping activities.

Corrective Steps Taken to Avoid Further Violation


Nuclear Performance Procedure 10.27 is being revised to clearly delineate that the deficient steps require sign-offs prior to proceeding to the next step. Additionally, the sequence of some steps within the procedure will be changed for clarification and ease of understanding.

Date When Full Compliance Will Be Achieved

Cooper Nuclear Station is currently in full compliance. The revision to Nuclear Performance Procedure 10.27 will be achieved by December 15, 1988.

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

Sincerely,

  
G. A. Trevors  
Division Manager  
Nuclear Support

GAT:GRH:ju

cc: ✓ U. S. Nuclear Regulatory Commission  
Region IV  
Arlington, TX

NRC Resident Inspector  
Cooper Nuclear Station