

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

511 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

November 13, 1997

G. R. Horn, Senior Vice President  
of Energy Supply  
Nebraska Public Power District  
1414 15th Street  
Columbus, Nebraska 68601

SUBJECT: RESPONSE TO NRC NOTICE OF VIOLATION (INSPEC. ON  
REPORT 50-298/97-13)

Dear Mr. Horn:

Thank you for your letter of October 14, 1997, in response to our September 12, 1997, letter and Notice of Violation concerning a failure to initiate a problem identification and resolution report for a test on the automatic depressurization system. We have reviewed your reply, and additional information discussed with Mr. Mike Peckham, Plant Manager, and members of your staff, during a telephone call on October 28, 1997.

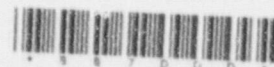
Inspection Report 50-298/96-31 and followup resident reports have identified failures to document conditions adverse to quality according to the problem identification and resolution report process. During the telephone call, your staff clarified that a historical review for determining generic implications from the failure to initiate a problem identification resolution report is included within the scope of a problem resolution team comprised of plant staff and contracted personnel.

We find your response and specifically, the clarification on a historical review for determining any generic implications which may have resulted from the failure to initiate a problem identification and resolution report, as a sufficient response 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,

Dr. Dale A. Powers, Chief  
Maintenance Branch  
Division of Reactor Safety

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PDR ADOCK 05000298  
G PDR



Docket No.: 50-298

License No.: DPR-46

cc:

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Randolph Wood, Director  
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Chairman  
Nemaha County Board of Commissioners  
Nemaha County Courthouse  
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Cheryl Rogers, LLRW Program Manager  
Environmental Protection Section  
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Lincoln, Nebraska 68509-5007

R. A. Kucera, Department Director  
of Intergovernmental Cooperation  
Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102

Kansas Radiation Control Program Director



E-Mail report to T. Frye (TJF)  
E-mail report to T. Hiltz (TGH)  
E-Mail report to NRR Event Tracking System (IPAS)  
E-Mail report to Document Control Desk (DOCDESK)

bcc to DCD (IE01)  
bcc distrib. by RIV:

Regional Administrator  
DRP Director  
DRS Director  
DRS Deputy Director  
Branch Chief (DRP/C)  
Branch Chief (DRP/TSS)

Project Engineer (DRP/C)  
Resident Inspector  
DRS-PSB  
MIS System  
RIV File

DRS ACTION ITEM NO: 97-G-0117

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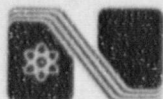
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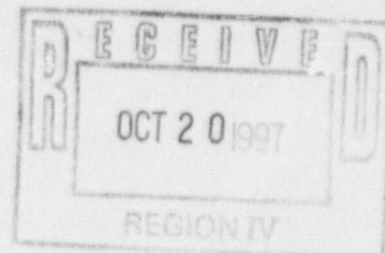
## Nebraska Public Power District

COOPER NUCLEAR STATION  
P.O. BOX 96, BROWNVILLE, NEBRASKA 68321  
TELEPHONE (402)825-3811  
FAX (402)825-5211

NLS970179

October 14, 1997

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001



Gentlemen:

Subject: Reply to a Notice of Violation  
NRC Inspection Report No. 50-298/97-13  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from A. T. Howell III (USNRC) dated  
September 12, 1997, "NRC Inspection Report 50-298/97-13 and Notice of  
Violation"

By letter dated September 12, 1997 (Reference 1), the NRC cited Nebraska Public Power District (District) as being in violation of NRC requirements. This letter, including Attachment 1, constitutes the District's reply to the referenced Notice of Violation in accordance with 10 CFR 2.201. The District admits to the violation and has completed all corrective actions necessary to return CNS to full compliance.

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

Sincerely,

P. D. Graham  
Vice President of Nuclear Energy

/rar  
Attachment

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

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97-0220180

Powerful Pride in Nebraska



NLS970179  
October 14, 1997  
Page 2 of 2

Senior Resident Inspector  
USNRC

NPG Distribution

REPLY TO SEPTEMBER 12, 1997, NOTICE OF VIOLATION  
COOPER NUCLEAR STATION  
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from July 28, 1997, through August 14, 1997, one violation of NRC requirements was identified. The particular violation and the District's reply are set forth below:

Violation

*Technical Specification 6.3.2, states, in part, that written procedures and instructions shall be established, implemented, and maintained for the following: ...B. Actions to be taken to correct specific ... malfunctions of safety-related systems or components.*

*Surveillance Procedure 6.1ADS.301, "ADS Reactor Pressure Permissive Calibration and Function and Logic Tests (Reactor in Run) (Div 1)," Revision 1, Step 8.27, states, in part, that test personnel are to connect a meter to read resistance and verify the contacts are closed.*

*Administrative Procedure 0.5, "Problem Identification and Resolution," Revision 8, Section 14.2, requires, in part, that all personnel are responsible for reporting problems that are, or potentially could be, conditions adverse to quality through the process of this procedure.*

*Contrary to the above, on July 23, 1997, the licensee failed to write a problem identification and resolution report for a known failure to follow a safety-related procedure. Specifically, during performance of Step 8.27 of Surveillance Procedure 6.1ADS.301, when contacts were found open rather than closed, test personnel raised the test pressure (which closed the contacts), and then proceeded with the test without reporting this condition in a problem identification and resolution report.*

*This is a Severity Level IV violation (Supplement 1)(298/9317-02).*

Admission or Denial to Violation

The District admits the violation.

Reason for Violation

The failure to generate a Problem Identification Report (PIR) is a procedural adherence problem. Administrative Procedure 0.5, "Problem Identification and Resolution," contains the appropriate requirements with respect to initiation of a PIR; however, strict compliance with the Procedure



0.5 was not enforced by supervision. The failure to meet procedural conditions stated in Procedure 6.1ADS.301 was recognized and documented on a Discrepancy Sheet per Administrative Procedure 0.26, "Surveillance Program." However, the action plan to resolve the immediate condition created a "sense of correctness" in the plan and led to the completion of the surveillance without the generation of a PIR.

An additional contributing cause for the failure to generate a PIR when surveillance procedure conditions are not met is the redundancy in requirements of the 0.26 and 0.5 Procedures. The documentation of procedural discrepancies with Procedure 0.26 Discrepancy Sheets without the accompanying Procedure 0.5 PIR is a recurring problem at CNS.

#### Corrective Steps Taken and the Results Achieved

Corrective actions taken include:

- The generation of PIR Serial Number 2-16718.
- Conducting an informal discussion of this event and the need to generate PIRs during a subsequent Instrument and Control (IAC) shop morning meeting.
- The development of a tailgate training session for maintenance personnel on the requirements to generate PIRs in accordance with the guidance contained in Procedure 0.5. Implementation of this training has been initiated.

As a result of informal discussion, during the weekly performance of this procedure, and the associated Division II procedure, six additional PIRs have been generated.

- On going corrective actions to address the site wide issue of procedural adherence have been made a station alignment issue and incorporated into the business plan.

#### Corrective Steps That Will Be Taken to Avoid Further Violations

- CNS will revise Procedure 0.26 to eliminate the redundant procedural requirements which exist within Procedure 0.26 and Procedure 0.5.

This action will be complete by 10/24/97.

- CNS will conduct additional tailgate training sessions to ensure Maintenance, Operations and Engineering personnel that perform surveillance testing have been trained to the requirements of Procedure 0.5.

- CNS will incorporate the above training requirements into recurring Industry Events training for Maintenance, Operations and Engineering Department personnel that perform surveillance testing.
- CNS will train Maintenance, Operations and Engineering Department personnel that perform surveillance testing on the requirements of revised Procedure 0.26.

The above actions will be completed by November 30, 1997.

- CNS is continuing to review samples of surveillances with Procedure 0.26 discrepancy sheets attached to identify additional areas where PIRs should have been generated. Based on the results of the review, appropriate corrective actions will be implemented.

Date When Full Compliance Will Be Achieved

The District is in full compliance with respect to the cited violation.



Correspondence No: NLS970179

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

[illegible]