

Nebraska Public Power District

COOPER NUCLEAR STATION P.O. BOX 98, BROWNVILLE, NEBRASKA 66321 TELEPHONE (402)825-3811 FAX (402)825-5211

NLS970202 November 24, 1997

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

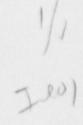
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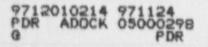
- Subject: Revision of Commitment Made in Reply to Notice of Violation Cooper Nuclear Station, NRC Docket 50-298, DPR-46
- Reference
- Letter to Document Control Desk (NRC) from Graham (NPPD) dated October 14, 1997, "Reply to Notice of Violation"
- Letter to G. R. Horn (NPPD) from A. T. Howell III (USNRC) dated September 12, 1997, "NRC Inspection Report 50-298/97-13 and Notice of Violation"

By letter dated October 14, 1997 (Reference 1), responding to a Notice of Violation (Reference 2), Nebraska Public Power District (District) committe⁴ to revise Cooper Nuclear Station Administrative Procedure 0.26, "Surveillance Program: to eliminate redundant procedural requirements contained within Procedure 0.26 and Administrative Procedure 0.5 "Problem Identification and Resolution" The District instead, revised Procedure 0.26 to provide clear guidance for the use of the Discrepancy Sheet (Attachment 3 to Procedure 0.26) and reinforce that the use of the Discrepancy Sheet does not relieve the user from applying the requirements of Procedure 0.5, and generating a Problem Identification Report (PIR) when applicable. Additional information supporting this commitment change is provided below.

Procedure 0.26 contains a Discrepancy Sheet (Attachment 3) to document and link discrepancies and resolutions resulting from/during performance of a test. The marking of a procedural step as N/A without conditional direction within the procedure, and the discovery of failed equipment are each examples of a discrepancy. The Discrepancy Sheet provides a means to document each of these conditions and their resolutions, and is intended to remain with the procedure to provide an auditable record of the performance of the procedure. The condition of failed equipment however, requires the generation of a PIR and further evaluation through the Corrective Action Program.

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With the revision of this commitment, in conjunction with the revision to Procedure 0.26, the District regards this issue as closed. Should you have any questions concerning this matter, please contact me.

Sincerely,

PB Theken

P. D. Graham Vice President of Nuclear Energy

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cc. Regional Administrator USNRC - Region IV

> Senior Project Manager USNRC - NRR Project Directorate IV-1

Senior Resident Inspector USNRC

NPG Distribution

ATTACHMENT 3 LIST OF NRC COMMITMENTS

. Correspondence No: NLS970202

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.

	COMMITMENT	COMMITTED DATE OR OUTAGE
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PROCEDURE NUMBER 0.42	REVISION NUMBER 5	PAGE 9 OF 13