



## Nebraska Public Power District

COOPER NUCLEAR STATION  
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NLS970202  
November 24, 1997

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

Gentlemen:

Subject: Revision of Commitment Made in Reply to Notice of Violation  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

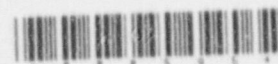
- Reference:
1. Letter to Document Control Desk (NRC) from Graham (NPPD) dated October 14, 1997, "Reply to Notice of Violation"
  2. Letter to G. R. Horn (NPPD) from A. T. Howell III (USNRC) dated September 12, 1997, "NRC Inspection Report 50-298/97-13 and Notice of Violation"

By letter dated October 14, 1997 (Reference 1), responding to a Notice of Violation (Reference 2), Nebraska Public Power District (District) committed 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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Jed

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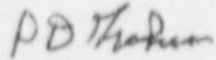
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With the revision of this commitment, in conjunction with the revision to Procedure 0.26, the District regards this issue as closed. Should you have any questions concerning this matter, please contact me.

Sincerely,



P. D. Graham  
Vice President  
of Nuclear Energy

/rar

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

NPG Distribution

Correspondence No: NLS970202

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