

APPENDIX A

NOTICE OF VIOLATION

Nebraska Public Power District (NPPD)  
Cooper Nuclear Station

Docket: 50-298/86-15  
License: DPR-46

During an NRC inspection conducted April 21-26, 1986, violations of NRC requirements were identified. The violations involved (1) Failure to comply with technical specifications (TS), (2) Failure to implement technical specification requirements, and (3) Failure to have an adequate work control procedure. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

- A. CNS Technical Specifications Limiting Condition for Operation (LCO) 3.19, "Fire Barrier Penetration Seals," states that: "A. Fire barrier and fire wall penetration fire seals integrity shall be maintained. B. If the requirements of 3.19.A cannot be met, a continuous fire watch shall be established on at least 1 side of the penetration within 1 hour."

Contrary to the above, it was found, at the time of this inspection, that the licensee had failed to establish a continuous fire watch while the locking mechanisms were removed from the access doors to the auxiliary relay room, reactor protection system rooms 1A and 1B in the control building at elevation 903'-6".

This is a Severity Level IV violation. (Supplement I)  
(298/8615-06)

- B. CNS Technical Specifications Section 6.3.2.E states that: "Written procedures and instructions . . . shall be provided and adhered to for the following: . . . E. Implementation procedures for the Fire Protection Program."

CNS Technical Specifications Section 3.19 states that: "A. Fire barrier and fire wall penetration fire seals integrity shall be maintained. B. If the requirement of 3.19.A cannot be met, a continuous fire watch shall be established on at least 1 side of the penetration within 1 hour." The "applicability" paragraph of 3.19 states that: "Applies to the integrity of all fire barrier and fire wall penetration fire seals."

Contrary to the above, CNS Procedure 0.16, "Control of Fire Doors", Revision 1, dated December 19, 1984, does not uniformly apply LCO 3.19 to all fire doors. The procedure defines three categories of doors and stipulates the requirements for posting or not posting a fire watch.

This is a Severity Level V violation. (Supplement I)  
(298/8615-07)

- C. 10 CFR 50, Appendix B, Criterion V states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . . Instructions, procedures, or drawings shall include

appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

CNS Technical Specification Section 6.3.3 states, in part, "The following maintenance and test procedures will be provided . . . C. Preventive or corrective maintenance of plant equipment and systems that could have an effect on nuclear safety."

Contrary to the above, work item No. 86-0692, dated February 12, 1986, contained no acceptance criteria, did not define an installation tolerance, was not identified as a Technical Specification item, and did not identify the work as affecting a fire penetration. This work item installed the inactive side of double door H109 which is a 3-hour rated door for the DC switchgear room 1B. The work was signed off as completed but the floor to door gap was in excess of the 3/4" allowed by NFPA-80.

This is a Severity Level IV violation. (Supplement I)  
(298/8615-08)

Pursuant to the provisions of 10 CFR 2.201, Nebraska Public Power District is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this 25<sup>th</sup> day of July, 1986