



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS970180
October 16, 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. 50-298/97-15
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Reference: 1. Letter to G. R. Horn (NPPD) from A. T. Howells III (USNRC) dated
September 19, 1997, "NRC Inspection Report 50-298/97-15 and Notice of
Violation"

By letter dated September 19, 1997 (Reference 1), the NRC cited Nebraska Public Power District (District) as being in violation of NRC requirements. This letter, including Attachment 1, outlines 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.

In addition in Reference 1 the District was requested to confirm on the docket the commitment to resubmit the summary report for the Vehicle Barrier System. This letter confirms the District's commitment to this action.

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

Sincerely,

P. D. Graham
Vice President
of Nuclear Energy

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Attachment

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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

REPLY TO SEPTEMBER 19, 1997, NOTICE OF VIOLATION
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from August 18, 1997, through August 22, 1997, one violation of NRC requirements was identified. The particular violation and the District's reply are set forth below:

Violation

Vehicle Barrier System

10 CFR 73.55(c)(7) requires that licensees establish vehicle control measures to protect against the use of a land vehicle as a means to gain unauthorized proximity to vital areas.

Paragraph 3.1.3 of the licensee's physical security plan requires that the licensee install a vehicle barrier system to meet the requirements of 10 CFR 73.55(c)(7).

Contrary to the above, on August 19, 1997, the inspector determined that:

- (1) Two gaps of approximately 6 and 7 feet existed on the northwest portion of the vehicle barrier system*
- (2) One of the active system barriers could be easily and quickly defeated by hand tools*

The active barrier issue (Example 2) was corrected prior to the end of the inspection and does not require a response.

This is a Severity Level IV violation (Supplement I!!)(50-298/9715-01).

Admission or Denial to Violation

The District admits the violation.

Reason for Violation

As directed in the above stated violation, this response addresses only Example (1). The gaps in the Vehicle Barrier System (VBS) existed at both ends of a natural/man made barrier. The reason for the violation was because the design, review and acceptance for the VBS focused on the ability of the system to stop the "Design Basis Threat." An evaluation of a threat of lessor

magnitude than the "Design Basis" was not adequately considered in the design or acceptance of the placement of bollards on either side of this natural/man made barrier.

Corrective Steps Taken and the Results Achieved

Corrective actions taken include:

- The immediate posting of a security officer in accordance with Security Procedures.
- The placement of temporary barriers within forty eight (48) hours of identification of the condition.

The placement of the temporary barriers meets the requirements of 10 CFR 73.55.

- A modification to install additional permanent barriers has been approved by the CNS Station Operations Review Committee. This modification will be implemented in accordance with the CNS work prioritization schedule.

Corrective Steps That Will Be Taken to Avoid Further Violations

No further corrective actions are required. The placement of the additional permanent barriers provides a continuous VBS for the entire site perimeter.

Date When Full Compliance Will Be Achieved

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

Correspondence No: NLS970180

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