

SEP 8 - 1987

In Reply Refer To:
Docket: 50-298/87-12

Nebraska Public Power District
ATTN: George A. Trevors
Division Manager - Nuclear Support
P. O. Box 499
Columbus, NE 68601

Gentlemen:

Thank you for your letter of August 27, 1987, in response to our letter and the attached Notice of Violation dated July 30, 1987. As a result of our review, we find that additional information, as discussed with your Mr. G. Trevors, during a telephone call on September 3, 1987, is needed. Specifically, we request that you provide copies of the training records which were missing at the time of our inspection and clarify the exemptions from training (i.e., for whom, for how long, and why were exemptions granted). Additionally, we request that you describe what measures you have taken to assure that records, which are removed for audits, are traceable.

Please provide the supplemental information within 30 days of the date of this letter.

Sincerely,

/s/
L. J. Callan, Director
Division of Reactor Safety
and Projects

cc:
Guy Horn, Division Manager
of Nuclear Operations
Cooper Nuclear Station
P. O. Box 98
Brownville, Nebraska 68321

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PDR ADDCK 05000298
Q PDR

Kansas Radiation Control Program Director

Nebraska Radiation Control Program Director

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

RPB
RRI
Section Chief (RPB/A)
RPSB
MIS System
RIV File
RSTS Operator

C:RPB/A
JPJaudon:cs
9/1/87

for
C:RPB
JEGagliardo
9/1/87

DRSP
R. D. Martin, RA
D. Weiss, RM/ALF
RSB
Project Inspector, RPB
R. Hall
W. Long, NRR Project Manager

D:DRSP
LJCallan
9/1/87

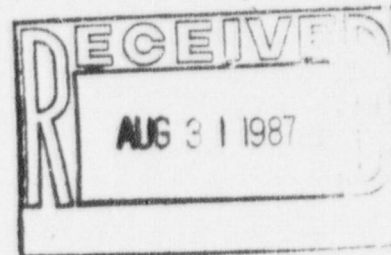
IE01



Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499
TELEPHONE (402) 564-8561

NLS8700415
August 27, 1987



U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: NPPD Response to IE Inspection Report No. 50-298/87-12

Gentlemen:

This letter is written in response to your letter dated July 30, 1987, which transmitted IE Inspection Report No. 50-298/87-12. Therein you indicated that certain of our activities were in violation of NRC requirements.

Following are the statements of the violation and our responses in accordance with 10 CFR 2.201:

A. STATEMENT OF VIOLATION

Failure To Follow SRAB Instructions

Criterion XVII of Appendix B to 10 CFR Part 50 and the licensee's approved Quality Assurance Plan require that, "Sufficient records shall be maintained to furnish evidence of activities affecting quality." The Safety Review and Audit Board (SRAB) Guidelines and Instructions, dated March 11, 1986, require that the SRAB administrator maintain records demonstrating that each member of SRAB received at least 20 hours of training annually.

Contrary to the above, review of the SRAB administrator's training records for 1986, showed that three SRAB members were not documented as receiving the required training.

This is a Severity Level IV violation. (Supplement I)(298/8712-02)

REASON FOR VIOLATION

During June and subsequent to the NRC inspection, an audit of the SRAB training records was performed by the District's Quality Assurance Department. This audit indicated that the members of SRAB, except for those exempted, had met the 20 hour training requirement. Due to the closeness of the two inspections, the Acting SRAB Administrator had not properly refiled the training records thus not all were available for review by the inspector. The records have been reassembled and the documentation again exists to validate that the training requirement was met. At the October 1986 SRAB meeting when the training records review was discussed, it was noted that the SRAB member which was appointed in August 1986 was exempt from the requirement. The minutes inadvertently failed to indicate that the new member appointed in September 1986 was also exempted.

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IEO1

August 27, 1987

CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

The District does not concur that there was a violation of the SRAB training requirement. All training received by SRAB members, which is credited towards the 20 hours, is formally documented on a special form and approved by the SRAB Chairman. At the next scheduled SRAB meeting, a correction to the Meeting 112 minutes will be made to also include the exemption of the September 1986 appointed member.

CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATIONS

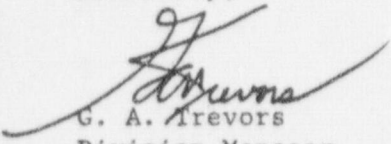
A new SRAB Training Record form is now being used to document training by SRAB members. In addition, all of the 1986 and subsequent training records have been converted to the new form.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

NPPD is currently in full compliance.

If you have any questions regarding this response, please contact me or K. C. Walden.

Sincerely,


G. A. Trevors
Division Manager
Nuclear Support

/jw

cc: ✓ U.S. Nuclear Regulatory Commission
Region Office - Region IV

NRC Resident Office
Cooper Nuclear Station