JUN 12 1989

In Reply Refer To:
Docket: 50-298/88-24

Nebraska Public Power District
ATTN: George A. Trevors
Division Manager - Nuclear Support
P.O. Box 499
Columbus, NE 68602-0499

Gentlemen:

Thank you for your letter, dated May 22, 1989, in response to our letter, dated April 24, 1989. We have no further questions at this time and will review your corrective action during a future inspection.

Sincerely,

Original Signed by
Edward J. Baker for
James L. Milhoan, Director
Division of Reactor Projects

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

Kansas Radiation Control Program Director

Nebraska Radiation Control Program Director

| RIV:RI:OPS | C:OPS | D:DRS | D:DD |
|---|---|---|---|
| DHunter/cjg | JGagliardo | LJCallan | JLMilhoan |
| 6/8/89 | 6/8/89 | 6/9/89 | 6/9/89 |

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PDR ADOCK 05000298
Q PDC

IE01
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bcc w/enclosure:
bcc to DMB (IE01)

bcc distrib. by RIV:

RRI
Section Chief (DRP/C)
RPB-DRSS
RIV File
RSTS Operator
P. O'Connor, NRR Project Manager (MS: 13-D-18)
DRS
D. Hunter
J. Gagliardo
R. D. Martin, RA
Lisa Shea, RM/ALF
MIS System
Project Engineer (DRP/C)
DRP

Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499
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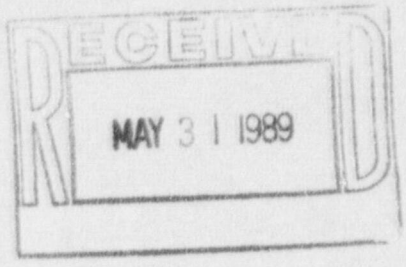
NLS8900184
May 22, 1989




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

Subject: Response to Inspection Report 88-24
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

References: 1) Letter from L. J. Callan (NRC) to G. A. Trevors (NPPD) dated April 24, 1989, same subject

2) Letter from G. A. Trevors (NPPD) to USNRC dated December 8, 1988, same subject

Gentlemen:

This letter is written in response to your letter dated April 24, 1989, Reference 1, and revises the District's earlier response to the subject Inspection Report and Notice of Violation, Reference 2.

Following is the statement of the violation and our response in accordance with 10CFR2.201:

Statement of Violation

Failure to Adequately Review Procedure Changes

The Cooper Nuclear Station Technical Specification (TS) 6.2.1.B.4.a, requires in part, that the safety evaluations for changes to procedures shall be reported to and reviewed by the Safety Review and Audit Board to verify that such actions did not constitute an unreviewed safety question.

Contrary to the above, the safety evaluation for changes to normal, abnormal, maintenance, and emergency operating procedures, which were reviewed by the Station Operations Review Committee in accordance with TS 6.3.1, 6.3.2, 6.3.3, and 6.3.4, were not being routinely provided to the Safety Review and Audit Board for their required review in meetings No. 115 through 130, dated January 1987 through September 1988.

This is a Severity Level IV Violation. (Supplement I) (298/8824-02)

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IE-89-203

Reason for Violation

The violation occurred as a result of the District's misinterpretation of what constitutes a safety evaluation for changes to procedures. The District now agrees that the "Safety Evaluation Applicability review" conducted on every procedure change constituted a safety evaluation and under CNS Technical Specification 6.2.1.B.4.a, these evaluations must be provided to and reviewed by the District's Safety Review and Audit Board (SRAB).

Corrective Steps Which Have Been Taken and the Results Achieved

Commencing with SORC Meeting S88-154, dated October 13 and 14, 1988 the SRAB began reviewing procedure change cover sheets completed in accordance with CNS Procedure 0.4, "Preparation, Review and Approval of Procedures". These cover sheets include the safety evaluation in question.

Corrective Steps Taken to Avoid Further Violation

As indicated in Reference 2, the District has revised CNS Procedure 0.4 to clarify the purpose of, and difference between, a preliminary and a detailed safety evaluation. To avoid further violations in this area, all preliminary and detailed safety evaluations will be presented to the SRAB for review.

Date When Full Compliance Will be Achieved

Full compliance will be achieved by June, 1989.

Please contact me if you have any questions regarding this response.

Sincerely,

G. A. Trevors
Division Manager
Nuclear Support

GAT/kcw:jw

cc: Regional Administrator
USNRC - Region IV

NRC Resident Inspector
Cooper Nuclear Station