

APR 24 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 letters of December 8, 1988, and February 10, 1989, in response to our letter and the attached Notice of Violation dated November 8, 1988. As a result of our review and telephone conversations on April 12 and 14, 1989, we understand that you now agree that the violation did occur and that you will provide additional details regarding your actions to prevent recurrence of the violation.

We have no further questions regarding your response to the open items (298/8212-01; 298/8412-03) and will review the implementation of your corrective action during a future inspection.

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

Sincerely,

Original Signed By  
L. J. Callan

L. J. Callan, 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

bcc w/enclosures: (see next page)

RIV:OPS \*  
JEGagliardo/lb  
/ 89

D:DRS \*  
JLMilhoan  
/ 89

*J. Callan*  
D:DRP 4/24/89  
LJCallan  
4/24/89

\* previously concurred

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PDR ADOCK 05000298  
Q PDC

*LEO*  
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Nebraska Public Power District

- 2 -

bcc w/enclosures:  
bcc to DMB (1E01)

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  
J. E. Gagliardo

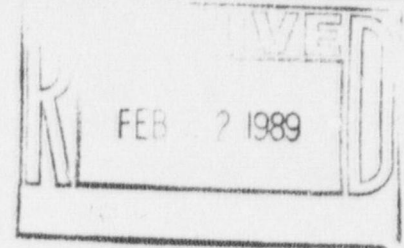
R. D. Martin, RA  
Lisa Shea, RM/ALF  
MIS System  
Project Engineer (DRP/C)  
DRP  
D. R. Hunter



# Nebraska Public Power District

GENERAL OFFICE  
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TELEPHONE (402) 564-8561

NLS8900075  
February 10, 1989



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

Subject: NPPD Response to NRC Open Item (298/8212-01; 298/8412-03): Failure to Develop and Implement Training Plan for Offsite Personnel Cooper Nuclear Station  
Docket No. 50-298, DPR-46

Reference (1) Letter from L. J. Callan to G. A. Trevors dated November 8, 1988, transmitting Inspection Report 88-24

Gentlemen:

This letter is written in response to Reference (1) in which you requested that the District describe the actions taken, or being planned, to resolve the issue of training for corporate technical support personnel as discussed in paragraph 2.4.4 of the subject report.

Following is a discussion of the open item and our response.

(Open) Open Item (298/8212-01; 298/8412-03): Failure to Develop and Implement Training Plan for Offsite Personnel - This open item identified the lack of a comprehensive training plan for corporate technical support personnel.

This program deficiency was identified on April 28, 1982, and it was identified as Open Item 298/8212-01. The licensee formed a task force to resolve this and other training issues. This task force developed a training program for general office (Corporate) personnel, which was approved on April 5, 1983. In 1984, this area was again reviewed by the NRC and it was found that "a formal written technical and nontechnical training program and requalification program which includes defined goals, objectives, schedules, lesson plans, methods of evaluating the effectiveness of the training, and methods for record retention had not been developed at the time of the inspection." This was again identified as an open item (298/8412-03). During its meeting on January 14, 1988, the SRAB reviewed this issue and recommended that action be taken to resolve this issue. During this inspection the NRC inspector found that this issue was still open. The NRC is concerned that this item has been open for at least 6 years and has asked the licensee to respond to this report with a description of the actions to be taken to resolve this issue.

IC-89-076

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Response

In March and April 1988 initial meetings were held between training and corporate engineering personnel to identify the steps required to establish a formal training program for appropriate Nuclear Engineering Department (NED) personnel to be developed using systematic - approach-to-training methods. As a result, matrices of available training courses were prepared to assist line management in defining their training needs.

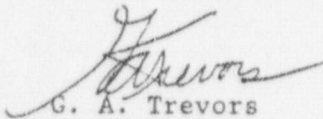
Pending the development of this formal program, which was to be described in a Training Program Description, in May 1988 a revision to the NED Training Task Book was issued. This NED Training Task Book had been used in the past to outline and describe an indoctrination and training program for newly hired engineers in NED. This revised book was used as an interim training course until the formal training program could be finalized. This training program methodology continues to be utilized in NED and is effective. Training records are maintained by the respective NED supervisors. Portions of this manual will be incorporated into the formal training program.

On September 23, 1988 and again on October 6, 1988 representatives of the Corporate Training Department, the Nuclear Training Department, and the Nuclear Engineering Department met to start drafting a Training Program Description (TPD), for the subject training program, in accordance with Nuclear Training Department procedures.

It is anticipated that this TPD will complete final review and be approved by March 1, 1989. Upon TPD approval this training program will be formally administered under Nuclear Training Department procedures and will have defined goals, objectives, lesson plans, effectiveness evaluations and record retention requirements.

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

Sincerely,

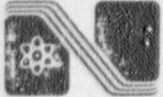


G. A. Trevors  
Division Manager  
Nuclear Support

/jw

cc: U.S. Nuclear Regulatory Commission  
Regional Office, Region IV  
Arlington, TX

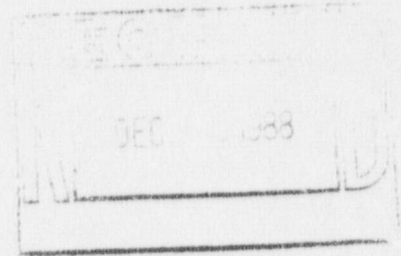
Resident Inspector Office  
Cooper Nuclear Station



# Nebraska Public Power District

GENERAL OFFICE  
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NLS8800554  
December 8, 1988



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

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

Reference: 1) Letter from L. J. Callan to G. A. Trevors dated  
November 8, 1988, transmitting Inspection Report 88-24

Gentlemen:

This letter is written in response to your letter dated November 8, 1988, Reference 1. Therein you indicated that one of our activities was in violation of NRC requirements.

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)

IC-88/876 88/21600-19 dup 3 pg.

Reason for Violation if Admitted

The District is of the opinion that a violation of CNS Technical Specification 6.2.1.B.4.a did not occur and requests a reconsideration of the violation. The District contends that safety evaluations for certain changes to procedures were submitted to and reviewed by the Safety Review and Audit Board (SRAB) in accordance with Technical Specification requirements.

CNS Procedure 0.4, "Preparations, Review, and Approval of Procedures," currently requires that every procedure change receive a Safety Evaluation Applicability review. The intent of this review is to screen all procedure changes to ensure that the ones which 1) could result in an unreviewed safety question or, 2) require a change to Technical Specifications, are identified and then subjected to a detailed safety evaluation. A key feature of the applicability review is that should any uncertainty exist regarding the potential for either an unreviewed safety question, or Technical Specification change, a detailed safety evaluation is also performed.

Sections V.B.6 and V.C.5 of CNS Procedure 0.4 provide that "Should the Safety Evaluation applicability review indicate that a Safety Evaluation is required, than the package shall be forwarded to the Engineering Manager. The Engineering Manager ensures that a detailed Safety Evaluation is performed in accordance with CNS Engineering Procedure 3.3, "Station Safety Evaluations." Procedure 3.3, Section V.A.6, then requires that the submittal be sent to the SRAB for their review.

The District's position is that the Safety Evaluation applicability review required by CNS Procedure 0.4 is a review to determine if a safety evaluation is required. It is recognized that the guidance provided in NRC Inspection and Enforcement Manual, Part 9800, dated January 1, 1984, allows a simpler screening process to be imposed for proposed changes (i.e., Is the Safety Analysis Report (SAR) affected?). However, as described above, the intent of CNS Procedure 0.4 is to provide a more comprehensive review of proposed procedure changes. In reality, the applicability review, however, is clearly not a detailed safety evaluation as specified by the CNS Tech Specs and need not be reviewed by the SRAB.

The District is concerned that the violation, as written, implies that the NPPD Safety Review and Audit Board must review all procedure changes to comply with Technical Specification 6.2.1.B.4.a. To require the review of all procedures is both inconsistent with the written requirements of the Technical Specification and ~~the~~ intent. The Standard Review Plan, Section 13.4 and the Second Proposed Revision 3 to Regulatory Guide 1.33, Appendix A, as well as the CNS Technical Specifications, are clear that the Independent Review and Audit Group (NPPD SRAB) is not responsible for reviewing all procedures, only those requiring detailed Safety Evaluations for the changes. To require SRAB to conduct these reviews is not required nor meaningful. This time-consuming effort and the resulting review would unnecessarily divert and dilute the safety responsibilities of those involved. On the other hand, we realize that the existing procedural requirements need to be clarified to address the purpose of, and difference between, a preliminary and detailed safety evaluation. This clarification will be implemented by March 1989.



December 8, 1988

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Based on the above, the District respectively requests your reconsideration of the violation. It should be noted during your reconsideration that we have proceeded to ensure that SRAB receives copies of all procedure change safety evaluations, both preliminary and detailed, to alleviate all NRC concerns in this area.

The District's response to Open Item (298/8212-01; 298/8412-03), Failure to Develop and Implement Training Plan for Offsite Personnel will be the subject of separate correspondence.

If you have any questions regarding this response, please contact me.

Sincerely,

*GE Waller for*

G. A. Trevors  
Division Manager  
Nuclear Support

/rg

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

Resident Inspector  
Cooper Nuclear Station