

APPENDIX A

NOTICE OF DEVIATION

Nebraska Public Power District
Cooper Nuclear Station (CNS)

Docket: 50-298
Operating License: DPR-46

Based on the results of an inspection conducted July 1-31, 1989, a deviation from your commitments to the NRC was identified. The deviation consisted of improper storage of training records. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the deviation is listed below:

Improper Storage of Training Records

10 CFR 50.54(a) requires that each licensee implement a quality assurance (QA) program as described in the Safety Analysis Report. CNS QA policy document, referenced in Appendix D of the CNS USAR, Section 2.6, "Document Control," commits the licensee to meet the requirements of ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants." Training Department instructions further specify what is considered quality records. ANSI N45.2.9-1974 specifies that quality records storage facilities meet certain construction requirements and be designed to prevent larceny and vandalism.

In deviation from the above, Training Department QA records are stored in a room which does not meet construction requirements or contain provisions to prevent larceny or vandalism in that: the walls are not constructed with reinforced concrete, concrete block, masonry, or equal construction; the sealant is not applied over walls as a moisture or condensation barrier; an adequate fire protection system is not present; and structures, doors, frames and hardware are not constructed to meet a 4-hour fire rating. (298/8925-01)

Nebraska Public Power District is hereby requested to submit a written statement or explanation to this Office within 30 days of the date of the letter transmitting this Notice. This reply, should include for each deviation: (1) the reason for the deviation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further deviations, 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 day of 1989

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