



Nebraska Public Power District

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NLS2014097
November 24, 2014

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Licensee Event Report No. 2014-004-00
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Dear Sir or Madam:

The purpose of this correspondence is to forward Licensee Event Report 2014-004-00.

There are no new commitments contained in this letter.

Sincerely,

Oscar A. Limpas
Vice President Nuclear-
Chief Nuclear Officer

/jo

Attachment: Licensee Event Report 2014-004-00

cc: Regional Administrator w/attachment
USNRC - Region IV

NPG Distribution w/attachment

Cooper Project Manager w/attachment
USNRC - NRR Project Directorate IV-1

INPO Records Center w/attachment
via ICES entry


Senior Resident Inspector w/attachment
USNRC - CNS

SORC Chairman w/attachment

SRAB Administrator w/attachment

CNS Records w/attachment

IE22
NRR

NRC FORM 366 (02-2014)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3150-0104		EXPIRES: 01/31/2017				
 LICENSEE EVENT REPORT (LER) (See Page 2 for required number of digits/characters for each block)				Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.						
1. FACILITY NAME Cooper Nuclear Station				2. DOCKET NUMBER 05000298		3. PAGE 1 of 3				
4. TITLE Implementation of Enforcement Guidance Memorandum 11-003, Revision 2, Causes Conditions Prohibited by Technical Specifications										
5. EVENT DATE			6. LER NUMBER		7. REPORT DATE		8. OTHER FACILITIES INVOLVED			
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR		
10	03	2014	2014	004	00	11	24	2014		
							FACILITY NAME DOCKET NUMBER 05000			
							FACILITY NAME DOCKET NUMBER 05000			
9. OPERATING MODE		11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)								
5		<input type="checkbox"/> 20.2201(b)		<input type="checkbox"/> 20.2203(a)(3)(i)		<input type="checkbox"/> 50.73(a)(2)(i)(C)		<input type="checkbox"/> 50.73(a)(2)(vii)		
		<input type="checkbox"/> 20.2201(d)		<input type="checkbox"/> 20.2203(a)(3)(ii)		<input type="checkbox"/> 50.73(a)(2)(ii)(A)		<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
		<input type="checkbox"/> 20.2203(a)(1)		<input type="checkbox"/> 20.2203(a)(4)		<input type="checkbox"/> 50.73(a)(2)(ii)(B)		<input type="checkbox"/> 50.73(a)(2)(viii)(B)		
		<input type="checkbox"/> 20.2203(a)(2)(i)		<input type="checkbox"/> 50.36(c)(1)(i)(A)		<input type="checkbox"/> 50.73(a)(2)(ii)		<input type="checkbox"/> 50.73(a)(2)(ix)(A)		
		<input type="checkbox"/> 20.2203(a)(2)(ii)		<input type="checkbox"/> 50.36(c)(1)(ii)(A)		<input type="checkbox"/> 50.73(a)(2)(iv)(A)		<input type="checkbox"/> 50.73(a)(2)(x)		
10. POWER LEVEL 000		<input type="checkbox"/> 20.2203(a)(2)(iii)		<input type="checkbox"/> 50.36(c)(2)		<input type="checkbox"/> 50.73(a)(2)(v)(A)		<input type="checkbox"/> 73.71(a)(4)		
		<input type="checkbox"/> 20.2203(a)(2)(iv)		<input type="checkbox"/> 50.46(a)(3)(ii)		<input type="checkbox"/> 50.73(a)(2)(v)(B)		<input type="checkbox"/> 73.71(a)(5)		
		<input type="checkbox"/> 20.2203(a)(2)(v)		<input type="checkbox"/> 50.73(a)(2)(i)(A)		<input type="checkbox"/> 50.73(a)(2)(v)(C)		<input type="checkbox"/> OTHER		
		<input type="checkbox"/> 20.2203(a)(2)(vi)		<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)		<input type="checkbox"/> 50.73(a)(2)(v)(D)		Specify in Abstract below or in NRC Form 366A		
12. LICENSEE CONTACT FOR THIS LER										
LICENSEE CONTACT Jim Shaw, Licensing Manager							TELEPHONE NUMBER (Include Area Code) (402) 825-2788			
13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT										
CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	
14. SUPPLEMENTAL REPORT EXPECTED						15. EXPECTED SUBMISSION DATE		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO										
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) During Refueling Outage 28 (RE-28), Cooper Nuclear Station implemented the guidance of Enforcement Guidance Memorandum (EGM) 11-003, Revision 2, "Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements During Operations with a Potential for Draining the Reactor Vessel," dated December 13, 2013. Consistent with EGM 11-003, Revision 2, secondary containment operability was not maintained during Operations with a Potential for Draining the Reactor Vessel activities, and Required Action C.2 of Technical Specification 3.6.4.1 was not completed. EGM 11-003, Revision 2, was implemented seven times during RE-28. These conditions are being reported as conditions prohibited by Technical Specifications. Implementation of EGM 11-003, Revision 2, during RE-28 was a planned activity. As such, there were no root cause evaluations of the events. Consistent with the guidance provided in EGM 11-003, Revision 2, Nebraska Public Power District will submit a license amendment request to adopt a Technical Specifications Task Force (TSTF) traveler associated with generic resolution of this issue within 12 months after the issuance of the Notice of Availability of the TSTF traveler.										

**LICENSEE EVENT REPORT (LER)**
(See Page 2 for required number of
digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Cooper Nuclear Station	05000298	YEAR	SEQUENTIAL NUMBER	REV NO	2 of 3
		2014	- 004	- 00	

NARRATIVE**PLANT STATUS**

Cooper Nuclear Station (CNS) was in Mode 5, Refueling, at 0 percent power, at the time of the event.

BACKGROUND

On December 13, 2013, the Nuclear Regulatory Commission issued Enforcement Guidance Memorandum (EGM) 11-003, Revision 2, "Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements During Operations with a Potential for Draining the Reactor Vessel." EGM 11-003, Revision 2, provides generic enforcement discretion to allow implementation of specific interim actions as an alternative to full compliance with plant technical specifications related to secondary containment operability during Mode 5 Operations with a Potential for Draining the Reactor Vessel (OPDRV) activities. To ensure compliance with interim actions specified in the EGM, CNS added guidance to plant procedure 0.50.5, Outage Shutdown Safety.

EVENT DESCRIPTION

During Refueling Outage 28 (RE-28), CNS implemented the guidance of EGM 11-003, Revision 2, seven times. Consistent with EGM 11-003, Revision 2, secondary containment operability was not maintained during OPDRV activities, and Required Action C.2 of Technical Specification (TS) 3.6.4.1 was not completed.

The following list provides the dates which EGM 11-003 was implemented (Note: All times are Central Daylight Time):

Start	End	Activity Performed
October 3, 2014, at 1602	October 4, 2014, at 1059	Draining Reactor Recirculation Pump [EIS: P] (RR-P) B without the jet pump plugs fully installed
October 3, 2014, at 2215	October 4, 2014, at 0251	Control Rod Drive (CRD) [EIS: AA] maintenance
October 16, 2014, at 0023	October 22, 2014, at 0425	Removal of jet pump plugs associated with RR-P-B maintenance
October 16, 2014, at 0437	October 18, 2014, at 0424	Venting the CRDs

(table continued)

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Cooper Nuclear Station	05000298	YEAR	SEQUENTIAL NUMBER	REV NO	3 of 3
		2014	- 004	- 00	

Start	End	Activity Performed
October 17, 2014, at 2233	October 18, 2014, at 2115	Defeating the scram function for two CRDs and support IVVI Inspections
October 18, 2014, at 0939	October 22, 2014, at 2336	RR-P-A seal maintenance
October 19, 2014, at 0435	October 22, 2014, at 2308	CRD freeze seal [EIS: SEAL]

BASIS FOR REPORT

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as conditions prohibited by CNS TS 3.6.4.1, which prohibits performing activities identified as OPDRVs in MODE 5 while secondary containment is inoperable.

SAFETY SIGNIFICANCE

As discussed in EGM 11-003, Revision 2, enforcement discretion is appropriate because the issues have low safety significance since licensees must implement compensatory measures to provide an adequate level of safety when using the discretion. To ensure compliance with the interim actions specified in the EGM, CNS added guidance to plant procedure 0.50.5. This procedure was implemented for the OPDRV activities during which secondary containment was not operable.

CAUSE

Implementation of EGM 11-003, Revision 2, during RE-28 was a planned activity. As such, there were no root cause evaluations of the events.

CORRECTIVE ACTION

CNS will submit a license amendment request to adopt the Technical Specifications Task Force (TSTF) traveler associated with generic resolution of this issue, within 12 months after issuance of the Notice of Availability of the TSTF traveler.

PREVIOUS EVENTS

There have been no events reported in the last three years related to EGM 11-003 or OPDRVs.