



**Nebraska Public Power District**  
*Nebraska's Energy Leader*

NLS2002029  
June 10, 2002

Ellis W. Merschoff  
Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive Suite 400  
Arlington, TX 76011

Dear Mr. Merschoff:

**Subject: Transmittal of The Strategic Improvement Plan (TIP) Revision 1  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46**

The purpose of this letter is to submit The Strategic Improvement Plan (TIP) Revision 1 for Cooper Nuclear Station (CNS) to the Nuclear Regulatory Commission (NRC). The plan was prepared to address requirements of the NRC Reactor Oversight Process Action Matrix for a plant in the repetitive degraded cornerstone status. CNS entered this status on April 1, 2002. TIP will be used during conduct of the NRC Inspection Procedure (IP) 95003 team inspection due to begin on June 24, 2002.

TIP is a long-term, broad-based plan that contains corrective actions and enhancements that will help lead CNS toward excellence through a phased approach. TIP Revision 1 was developed based on an evaluation of major assessments and improvement plans dating from 1993. Action plans were developed to address the extent of condition and the related causal factors.

TIP is a "living document" subject to revision and updating as future evaluations, assessments and issues dictate. The plan will be completed in phases until it is demonstrated that each action plan has addressed the underlying cause(s) of the stated problems from both an immediate and recurrence prevention perspective. Actions may be added to TIP to ensure the successful outcome of action plans or to address emerging issues.

Prior to CNS entering the repetitive degraded cornerstone status, Nebraska Public Power District (NPPD) had determined that an improvement plan was necessary to focus personnel on immediate improvements in CNS performance. Following the refueling outage in January 2002, CNS management began developing the improvement plan. The initial purpose of TIP Revision 0, issued on April 8, 2002, was to accomplish specific, near term objectives designed to arrest

degrading performance. Evaluation and assessment subsequent to issuance of Revision 0 have resulted in the development of TIP Revision 1, which has broader scope.

TIP Revision 0 initiated improvement actions in a number of focus areas, including:

- (1) Organizational Effectiveness
  - (a) Management Effectiveness
  - (b) Human Performance Fundamentals
  - (c) Corrective Action Program Effectiveness
- (2) Emergency Response Organization Performance
- (3) Operational Focus & Alignment
- (4) Training Program
- (5) Outage Planning and Effectiveness
- (6) On-line Work Management
- (7) Equipment Reliability
- (8) Engineering Programs
- (9) Fiscal Discipline

The results of the previously mentioned evaluation of past major assessments and improvement plans caused CNS management to increase the number of focus areas to 18 in TIP Revision 1. These focus areas have been aligned within the following four "Pillars of Excellence":

- (1) Organizational Excellence
- (2) Operational Excellence
- (3) Equipment Excellence
- (4) Training Excellence.

Benchmarking of other industry improvement and business plans have demonstrated that these Pillars of Excellence generally represent those fundamental areas of plant operation that must be present to sustain top-level performance.

TIP Revision 2 will be submitted after completion of the NRC IP 95003 inspection and will serve as a basis for the anticipated NRC Confirmatory Action Letter. Revision 2 will contain the results of a detailed resource prioritization, estimating, planning and scheduling process. Some start and completion dates in Revision 1 may be adjusted through this process. Revision 2 will also include enhancements from continuing evaluations and additional actions resulting from the NRC inspection and emerging issues. Specific performance improvement objectives or actions contained in Revision 2 will be identified as regulatory commitments. NPPD will submit TIP Revision 2 to the NRC following receipt of the NRC IP 95003 inspection report.

NPPD Quality Assurance will perform ongoing surveillances of TIP implementation throughout the implementation period.

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NPPD and the management of this station are committed to the individual, team and organizational behavior changes necessary to ensure successful results with both TIP and the longer-term transition to excellence in station performance.

Should you have any questions concerning this matter, please contact me at 402-825-2760.

Sincerely,



David L. Wilson  
Vice President - Nuclear

/jrs  
Attachment

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

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

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ATTACHMENT

The Strategic Improvement Plan, Revision 1

Cooper Nuclear Station  
Docket 50-298, License DPR-46