



Nebraska Public Power District
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NLS2003094
August 25, 2003


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

Subject: Safeguards Plan, Revision 44
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

The purpose of this letter is to transmit Revision 44 to the Cooper Nuclear Station Safeguards Plan in accordance with the provisions of 10 CFR 50.54(p). Attachment A provides a summary of the changes included in Revision 44, none of which represent a reduction of effectiveness. The enclosed material does not contain Safeguards Information.

If you have any questions regarding this submittal, please contact Paul Fleming at 402-825-2774.

Sincerely,


John Christensen
Acting Site Vice President

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Attachment/Enclosure

cc: Regional Administrator, with attachment/enclosure - 2 copies (Controlled Copies 5 and 6)
USNRC - Region IV

Senior Physical Security Inspector, with attachment/enclosure
USNRC - Region IV

NPG Distribution, without attachment/enclosure

Records, without attachment/enclosure

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NEBRASKA PUBLIC POWER DISTRICT SAFEGUARDS PLAN

COOPER NUCLEAR STATION

Revision 44

July 9, 2003

TABLE OF CHANGES

<u>PAGE</u>	<u>DESCRIPTION/REASON FOR CHANGE</u>
I-1-1	Change title of Senior Manager of Site Support to General Manager of Site Support to reflect current organizational structure.
I-13-1	Change title of Senior Manager of Quality Assurance to General Manager of Nuclear Performance Analysis, and change title of Senior Manager of Site Support to General Manager of Site Support to reflect current organizational structure.
I-A-1	Revise Security Organizational Chart to change title of Senior Manager of Site Support to General Manager of Site Support to reflect current organizational structure.
II-1-3	Change title of Senior Manager of Site Support to General Manager of Site Support to reflect current organizational structure.
II-3-1	Change title of Senior Manager of Site Support to General Manager of Site Support, and reflect that this position reports to the Vice President - Plant Support. These changes reflect the current organizational structure.

NLS2003094 ENCLOSURE
REVISED SAFEGUARDS PLAN PAGES

FILING INSTRUCTIONS

COOPER NUCLEAR STATION SAFEGUARDS PLAN
REVISION 44

REMOVE	INSERT
Page I-1-1, dated 2/17/03	Page I-1-1, dated 7/9/03
Page I-13-1, dated 3/22/02	Page I-13-1, dated 7/9/03
Page I-A-1, dated 2/17/03	Page I-A-1, dated 7/9/03
Page II-1-3, dated 10/28/97	Page II-1-3, dated 7/9/03
Page II-3-1, dated 10/28/97	Page II-3-1, dated 7/9/03

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

SAFEGUARDS PLAN

REVISION 44

July 9, 2003

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CHAPTER 1

SECURITY ORGANIZATION

1.1 Security Organization

1.1.1 Organization

The General Manager of Site Support, who reports to the VP-Plant Support, has overall responsibility for managing the security force and administering the Safeguards Plan. Outside of normal working hours, the Station Shift Supervisor will normally assume these responsibilities (see Attachment "A"). Their responsibilities include the authority to suspend any or all portions of this plan during nuclear safety related emergencies; if the action is needed immediately to protect the health and safety of the public and no action consistent with license conditions and the technical specifications, that can provide adequate or equivalent protection, is immediately apparent. Suspension of safeguards measures must be reported in accordance with 10 CFR 73.71 unless a report has been made under 10 CFR 50.72. During periods when the General Manager of Site Support is unavailable, he may delegate his responsibilities, verbally or in writing, to a designee. If there are any changes made to vital area boundaries or the status of vital area doors or locks the General Manager of Site Support shall initiate a review of the Security Plan, Contingency Plan and procedures to ensure that the changes do not impact plant or personnel safety. An annual review of the Security Plan, Contingency Plan and procedures shall be conducted to evaluate their potential impact on plant and personnel safety.

The Security Manager, who reports directly to the General Manager of Site Support, and his staff are responsible for the daily operations of the security guard force and the implementation of the Safeguards Plan. A Security Shift Supervisor will be on duty directing all activities of the guard force shift on duty. A Security Shift Supervisor will not be assigned any routine tasks and therefore will always be available to direct the guard shift. He will also provide functional and administrative direction and coordinate security activities with the Station Shift Supervisor during non-normal working hours.

CHAPTER 13
SECURITY AUDITS

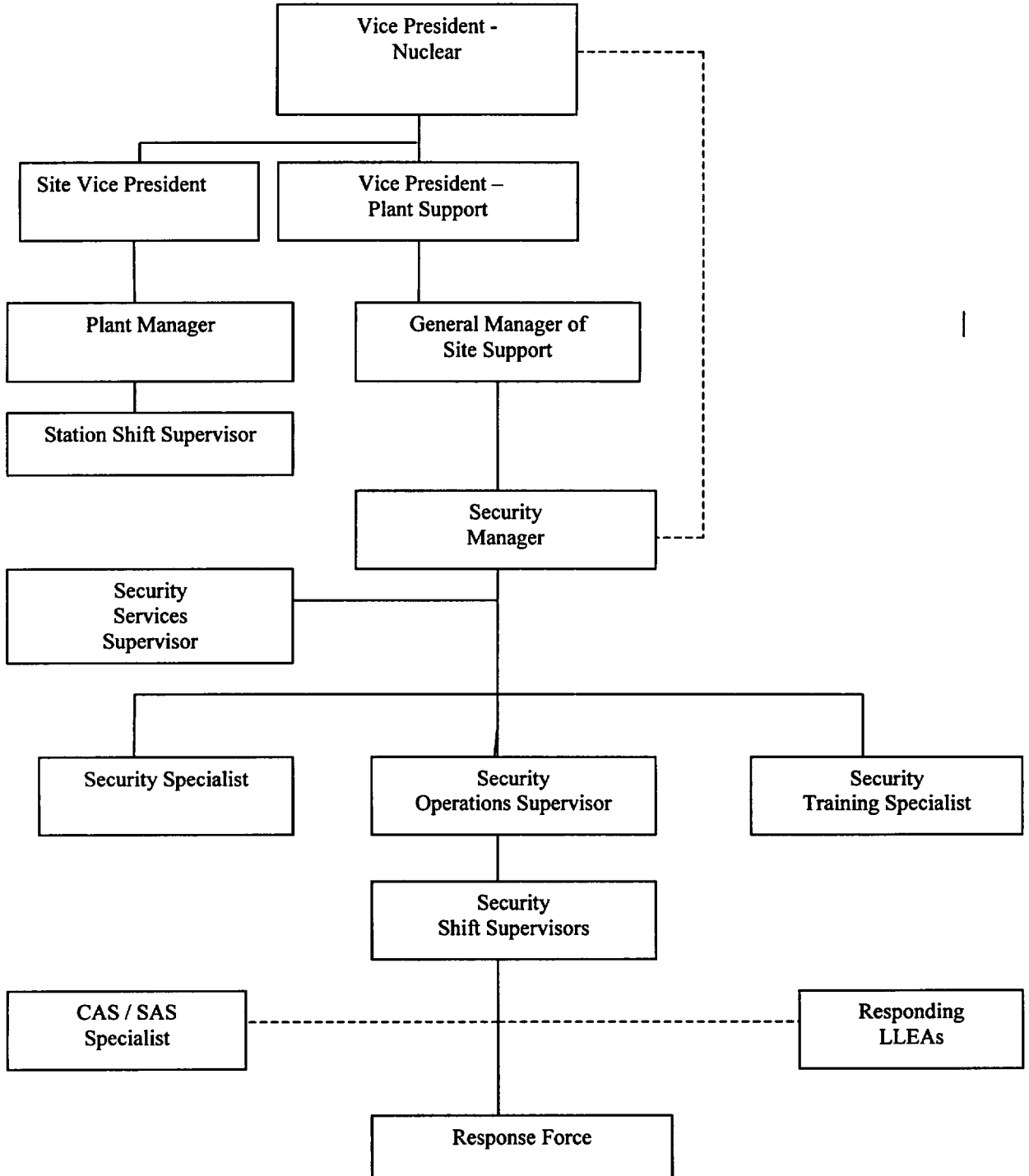
13.1 Program Compliance Audits

The monitoring program for station security presently used by the Quality Assurance Department is described in the Quality Assurance Plan. Independent site audits are conducted by the Quality Assurance Department. The Q.A. Manager is independent of Station Management reporting directly to the General Manager of Nuclear Performance Analysis. Audits and surveillance are conducted annually to cover the following types of activities:

1. Qualification of security procedures, including:
 - a. Checkout of security procedures through periodic training drills.
 - b. Training of personnel in use of procedures and equipment.
 - c. Periodic review of procedures to verify that they continue to be adequate or to develop necessary changes in procedures.
2. Uniform logs and procedures for recording security and visitor control activities.
3. Use of seals and locks to prevent or provide evidence of tampering and other security equipment specified in 10CFR73.55.
4. Regular inspection tours of physical security provisions.
5. Pre-arranged system of communicating significant events to station management on an immediate basis.
6. Prompt and direct administrative review of, and corrective action for, violations or breakdowns in security plans and activities.

Audits of the above activities are performed in accordance with detailed checklists. Due to the proprietary information involved in the above audit, distribution may be limited to the General Manager of Site Support, the Q.A. Manager at CNS, the General Manager of Nuclear Performance Analysis, SRAB Administrator, the Site Vice President and the Vice President-Nuclear.

COOPER NUCLEAR STATION
SECURITY ORGANIZATIONAL CHART



General Manager of Site Support: The General Manager of Site Support or the individual appointed acting during his absence.

Interdict: To authoritatively prohibit access or restrict the actions of intruders or saboteurs in accordance with 10CFR73.55, applicable State laws, and company policies.

Intruder: An individual present in a protected or vital area without authorization.

Investigation: Actions by individuals to determine if attempted sabotage or intrusion is in progress and if so, the source, nature, and extent of it.

LLEA: The local law enforcement agencies with whom the plant has agreements for assistance.

NPPD: Nebraska Public Power District, owner of Cooper Nuclear Station.

Reduced Vulnerability: Take actions that will decrease the probability of success of an attempt to sabotage (e.g., increased guard patrols, stricter access controls, barriers at full strength condition, increased remote surveillance, frequent checks of vital equipment).

Response: To assess potential threat situations and react as specified in 10CFR73.55.

SAS: The secondary alarm station as defined in 10CFR73.55.

Security Alert: A security-related situation that may not necessarily pose an immediate threat of danger to the plant but does call for an increased alertness posture by station personnel and the execution of specified procedures.

Security Shift Supervisor: The member of the Security force assigned to each shift who, in accordance with 10 CFR 73.55, has the authority to direct the Security activities of all members of the Security force. Responsibilities assigned to the individual may be assumed by Senior Management or the Station Shift Supervisor, or the Security Manager/Coordinator, if present.

Unauthorized Personnel: Persons not granted access to an area.

Unsubstantiated Threat: A threat in which no specific group claims responsibility, search results are negative, or no evidence is available other than the threat message.

CHAPTER 3

LICENSEE PLANNING BASE

3.1 Organizational Overview

Responsibilities of key personnel are given below.

Vice President - Nuclear - The Vice President - Nuclear has overview and coordination responsibility for operating and maintaining the plant in a safe and secure manner. He is responsible for protecting the plant staff and the general public from avoidable radiation exposure and any other consequences of a security emergency at the station. He bears responsibility for compliance with the facility operating license. He has authority to take any action necessary, without consultation, to prevent or mitigate the consequences of a security emergency.

Station Shift Supervisor - The Station Shift Supervisor is responsible for the actual operation of the station on his assigned shift. He directs the activities of the operators on his shift and must be cognizant of all maintenance activity being performed while he is on duty. The Station Shift Supervisor on duty has the authority to shutdown the unit if, in his opinion, conditions warrant this action. He has the authority to initiate the Emergency Plan.

General Manager of Site Support - The General Manager of Site Support is responsible for the overall management of the security guard force. He reports directly to the Vice President - Plant Support. He has overall responsibility for managing the security guard force and administering the CNS Safeguards Plan. He has authority to take actions necessary to prevent or mitigate the consequences of a security emergency.

Security Manager - The Security Manager has responsibility for the day-to-day operation of the security guard force. He reports directly to the General Manager of Site Support.

Security Shift Supervisor - Security Shift Supervisors are responsible for functional and administrative guidance of the guard force. They provide shift representation and coordinate all reporting and contingency events. They may be armed when situations warrant.

3.1.1 Security Organization

The Security organization during contingencies is the same as presented in Volume I for normal security.

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

Correspondence Number: NLS2003094

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing & Regulatory Affairs Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
None	