UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

March 12, 2004

Randall K. Edington, Vice
President-Nuclear and CNO
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

SUBJECT: SUMMARY OF THE MEETING WITH COOPER NUCLEAR STATION TO DISCUSS PROGRESS IN IMPLEMENTING THE STRATEGIC IMPROVEMENT PLAN

Dear Mr. Edington:

This refers to the meeting conducted at the NRC Region IV Office in Arlington, Texas, on March 1, 2004. The purpose of this meeting was to discuss your progress in implementing the Strategic Improvement Plan which was developed by Nebraska Public Power District (NPPD) to be a comprehensive improvement plan to address specific regulatory performance issues and to improve all aspects of station performance. The meeting focused on the Strategic Improvement Plan performance indicators and other effectiveness measures which are used to determine progress in meeting your commitments. In addition discussions were held to better understand NPPD's plans for closing the regulatory performance issues outlined in the NRC's Confirmatory Action Letter issued, January 30, 2003.

The attendance list and presentation slides are enclosed.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Kriss M. Kennedy, Chief
Project Branch C
Division of Reactor Projects

Docket: 50-298
License: DPR-46

Enclosures:
1. Attendance List
2. Licensee Presentation

cc w/enclosures:
Clay C. Warren, Vice President-Nuclear
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

John R. McPhail, General Counsel
Nebraska Public Power District
P.O. Box 499
Columbus, NE 68602-0499

P. V. Fleming, Licensing and
Regulatory Affairs Manager
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

Michael J. Linder, Director
Nebraska Department of
Environmental Quality
P.O. Box 98922
Lincoln, NE 68509-8922

Chairman
Nemaha County Board of Commissioners
Nemaha County Courthouse
1824 N Street
Auburn, NE 68305

Sue Semerena, Section Administrator
Nebraska Health and Human Services System
Division of Public Health Assurance
Consumer Services Section
301 Centennial Mall, South
P.O. Box 95007
Lincoln, NE 68509-5007

Ronald A. Kucera, Deputy Director
for Public Policy
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65101

Jerry Uhlmann, Director
State Emergency Management Agency
P.O. Box 116
Jefferson City, MO 65102-0116

Chief, Radiation and Asbestos
Control Section
Kansas Department of Health
and Environment
Bureau of Air and Radiation
1000 SW Jackson, Suite 310
Topeka, KS 66612-1366

Daniel K. McGhee
Bureau of Radiological Health
Iowa Department of Public Health
401 SW 7th Street, Suite D
Des Moines, IA 50309

William J. Fehrman, President
and Chief Executive Officer
Nebraska Public Power District
1414 15th Street
Columbus, NE 68601

Electronic distribution by RIV:
Regional Administrator **(BSM1)**
DRP Director **(ATH)**
DRS Director **(DDC)**
Senior Resident Inspector **(SCS)**
Branch Chief, DRP/C **(KMK)**
Senior Project Engineer, DRP/C **(WCW)**
Staff Chief, DRP/TSS **(PHH)**
RITS Coordinator **(KEG)**
Dan Merzke, Pilot Plant Program **(DXM2)**
RidsNrrDipmLipb

ADAMS: √ Yes ☐ No Initials: __WCW__
√ Publicly Available ☐ Non-Publicly Available ☐ Sensitive √ Non-Sensitive

R:_CNS\2004\CN3-1-04MS.wpd

RIV:SPE:DRP/C	C:DRP/C			
WCWalker;df	KMKennedy			
/RA/	/RA/			
3/4/04	3/12/04			

OFFICIAL RECORD COPY T=Telephone E=E-mail F=Fax

NRC Meeting

Nebraska Public Power District /
Cooper Nuclear Station
March 1, 2004
Arlington, Texas

Overview

Randy Edington
Vice President Nuclear
& Chief Nuclear Officer

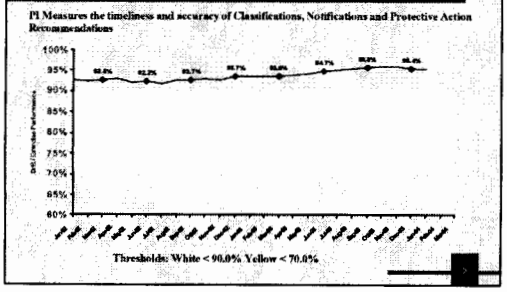
Overview

- Introductions
- Opening Comments
- Agenda
  - Emergency Preparedness White Findings Status
  - PI's / Timeline
  - Transition to Business Plan
  - CAL Assessment / Closure Plan
  - CAL Area Performance Review

Emergency Preparedness White Findings Status

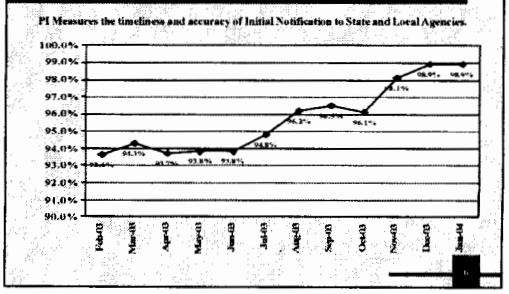
- Issues are Resolved
- Performance Improved and Sustained
- Closure of White Findings Appropriate
  - Current Performance Does Not Support Maintaining White Findings Open
  - Stakeholder Concerns

NRC Drill / Exercise Performance (DEP)

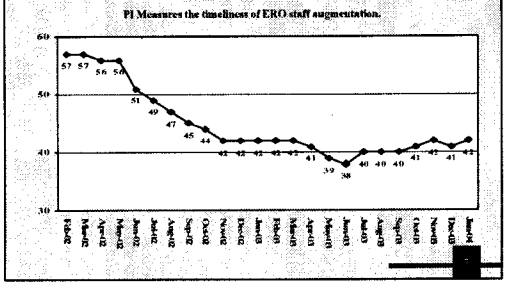


ERO Notification

(Initial Off-site Notification to State / Local Agencies)

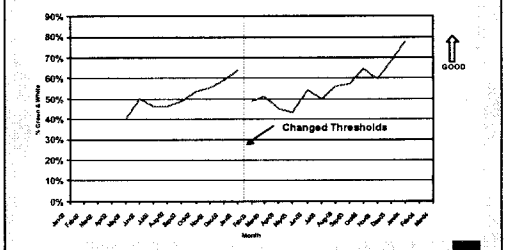


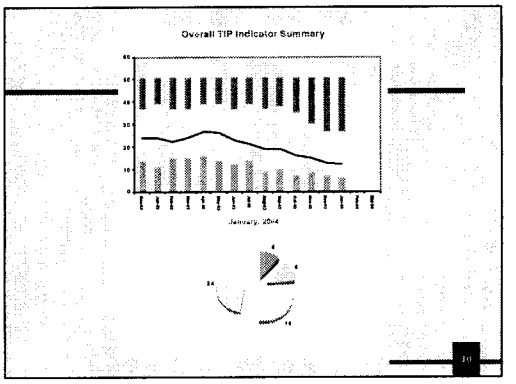
ERO Staff Augmentation (Time in Minutes)



Pillar / TIP PI Summary

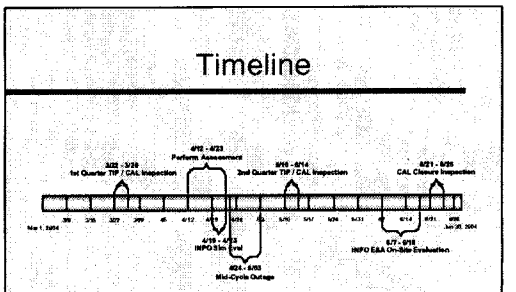
Pillar PI Summary
(% of PIs that are Green or White)





Timeline

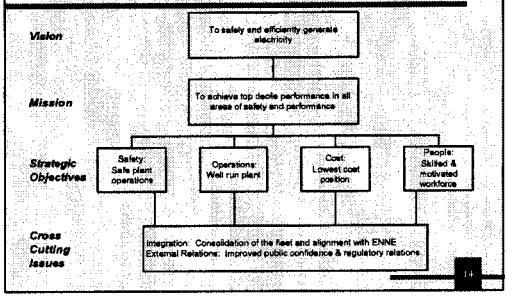
Timeline



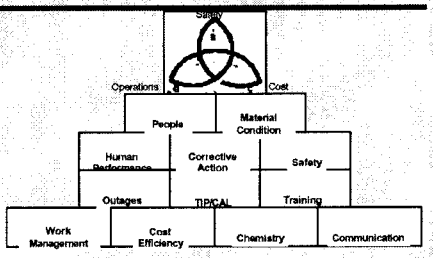
Transition to Business Plan

Stu Minahan
Acting Site Vice President

Entergy Strategic Framework



CNS Business Plan



Discussion of Business Plan

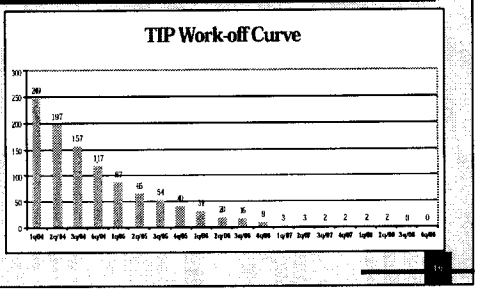
- First Draft Complete
- Departmental Roll Ups in Draft Form
- Web-based for Site Access
- Under Control of Vice President Nuclear / Chief Nuclear Officer

CAL / TIP Transition

CAL Transition

- 22 Items Remaining Projected at End of March (22 / 271 = 8%)
- Continued to be Tracked to Completion in CAP
- Incorporated into Business Plan by 03/31/04

TIP Work-off Curve



TIP Transition

- Intent is to Complete or Disposition
- Target Date Currently 3rd Quarter / 4th Quarter
- Establish TIP Transition Review Board
  - Cross-Section of Senior Managers and Managers
- Re-Baseline TIP

TIP Transition Review Board

- Line by Line Review
- Action Plan Synopsis by Owner
- Continued Tracking in CAP
- Captured Under Another Process

TIP Transition Review Board (cont.)

- Transition to Site BP or Departmental
  - Final Disposition Decided by VP
- Business Plan Disposition Based Upon Safety, Plant Needs, and Business Case

Quality Review

- QA Review to Ensure that Intent and Scope Captured in Business Plan Incorporation
- QA Review Appropriate Transition to CAP at Re-Zero Point (New Notifications)

Quality Review (cont.)

- QA Smart Sample Closures (Selected by Licensing)
- QA Review 1 Year Later in Addition to Internal Assessments Throughout Year

Sustainability

Sustainability (Programs and Processes)

- Multiple Cycle Plan + 5 Outage Schedule
- Import Processes from Entergy Fleet
- Entergy Fleet Standards
- Intrusive Interfaces with Entergy Fleet

Sustainability (People)

- Experienced Industry Personnel at Cooper
- Standards and Accountability
- Stability
- Resources
- Track Record

CAL Assessment / Closure Plan

Paul Fleming
Licensing & Regulatory Affairs Manager

CAL Assessment / Closure Plan

- Schedule
- Assessment
- Letter

Schedule

- Finalize/Approve Assessment Plan [Mid-March]
- 1st Qtr TIP/CAL Inspection [3/22 – 3/26]
- Perform Assessment [4/12 – 4/23]
- 2nd Qtr TIP/CAL Inspection [5/10 – 5/14]
- Assessment Report Final Approval [5/19]
- Letter to NRC (tentative) [5/26]
- NRC CAL Closure Inspection (tentative) [6/21]

CAL Closure Assessment Plan

- Scope / Approach
- Team Composition
- Approvals

Letter

- May 26th (tentative)
- Will Include
  - Assessment Process
  - Results / Conclusions for Each CAL Area
  - Basis for Requesting CAL be Lifted
  - Formal Request for Final Inspection

Human Performance

John Christensen
Plant Manager

Human Performance

- Not where we want to be, but we have set the foundation and are making an impact on behaviors and culture
- We have the infrastructure in place to sustain performance

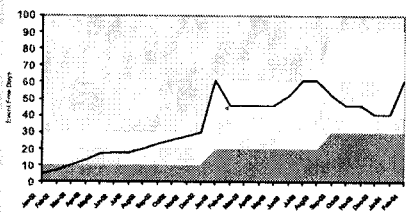
Human Performance (cont.)

- Additional Efforts in Progress:
  - Procedure Usage
  - Focused Operations Observations
  - Targeted HP Trainer Use
    - Identification
    - Electrical Safety
    - Pre-Outage
  - Entergy Fleet Initiatives

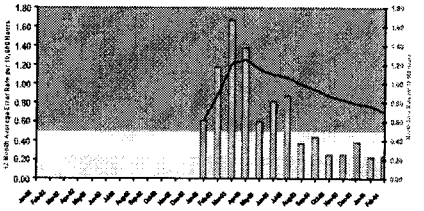
Human Performance Behavior Changes

- Better Engaged Staff
- Improved Ownership
- Pride in Performance
- Willingness to Provide Feedback
- Seeing Results and Impact of Change in Behaviors

Human Performance Event Free Days



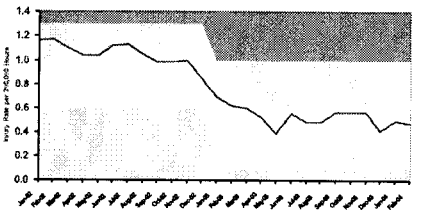
Human Performance Error Rate



Radiological Event Free Clock Averages

- All of 2003
  - 18 Resets
- Last 6 Months of 2003
  - 6 Resets
- Last 3 Months of 2003
  - 2 Resets
- First 2 Months of 2004
  - 1 reset

OSHA Recordable Injury Rate



Conclusion

- Foundation Laid – Continuous Improvement being shown in performance and behaviors
- We have established the infrastructure to ensure a continued organizational focus

Corrective Action

John Christensen
Plant Manager

CAP Progress Summary

- Improvement in Essentially all PI's, Particularly in Last Two Quarters
  - Root Cause Quality and Timeliness
  - Timeliness of Initial Evaluations
  - Decrease in Inventory and Backlog
- Current Initiatives in:
  - Identification
  - Priority
  - Effective Evaluations

Identification

- Integrated Issue Identification Teams
  - Piloted in January
  - Additional Training Based Upon Results
  - Have Integrated with Safety Committee
- HP Mock-up Training in April
- Focused Operations Observations

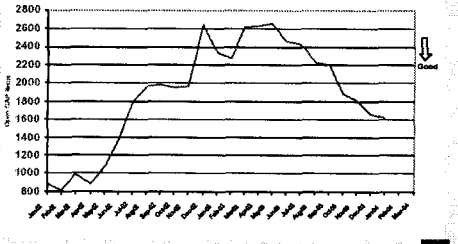
Priority

- Focus on Root Cause Evaluations and Actions
- Inventory Reduction
- Backlog Reduction

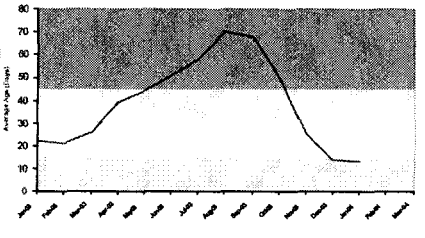
Evaluation

- Managers Now Accountable to 'Own' All Corrective Actions
- 100% Review by CAP Staff
- Management Corrective Actions Based Upon Roll-up of Rejection Information

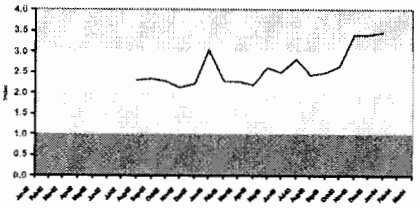
CAP Open Items



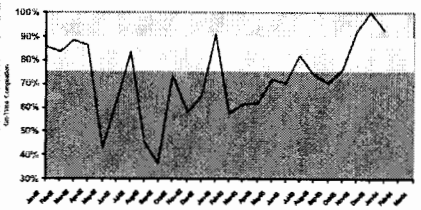
CAP Evaluation Average Age



CAP Performance Index



SCR On-Time Completion



CAP Summary

- Many Improvements Made
- 'Core Business' for the Site
- Entergy Organizational Focus
- Future Enhancements
  - PCRS
  - Inventory Reduction Goal

Engineering

Gary Kline
General Manager,
Engineering

Topics

- Engineering Programs
- Key Modifications, Projects, Configuration
- Equipment Reliability

Engineering Programs

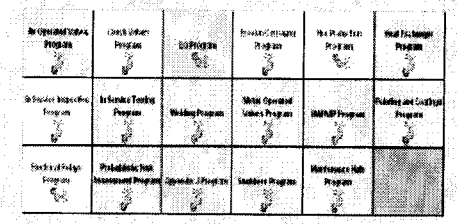
Engineering Programs

- 17 Programs
- No Red Programs as of January, 2004
- Program Procedure Established
- Objective Performance Measures Established

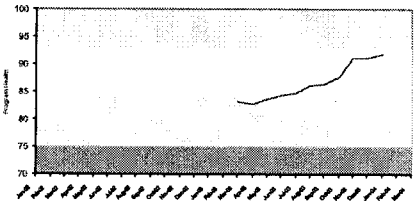
Engineering Programs

- Program Management Alignment with Entergy
- Program Manager is Vice Chair of Program Health Working Committee – INPO
- Bi-Weekly Plant Health Committee Presentations

Program Health



Program Health

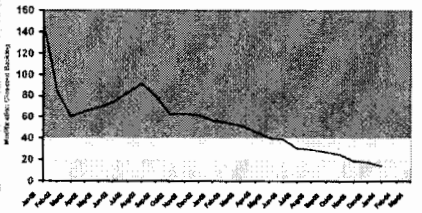


Key Modifications, Projects, Configuration

Key Modifications, Projects, Configuration

- Complete
  - DBI / LBI Project
  - MOD Process Revision (Specific Attributes)
- Remaining
  - Unauthorized Modification Project (1Q / 04)
  - MOD Process Benchmarking Entergy (4Q / 04)
  - DBI / LBI Project Assessments

Modification Closeout Backlog



Operability Determination Initiatives

- Completed 91-18 Training 4th Qtr 2003
- Completed Effectiveness Assessment
  - Largely Effective – Plan Developed to Take to Next Level
- Increased Sensitivity to OD Issue
  - Increased Management Oversight
  - Shift Manager Meetings
  - Communications

Operability Determination Initiatives (cont.)

- OD Improvement Action Plan
  - Entergy Process Incorporation into CNS Procedure
  - Training and Qualification Developed
  - Experts Designated in Operations and Engineering
  - Mentors in Use
  - Will Complete 1st Qtr 2004

Equipment Reliability

Equipment Reliability

- Completed Infrastructure Development
- Current Improvement Initiatives
- Equipment Reliability Strategies
- Equipment Reliability Successes

Completed Infrastructure Development

- Engineering Reorganization
  - Equipment Reliability Department
  - Maintenance Support
  - System Engineering Roles and Responsibilities
  - Program Department Rebuild
  - Key Manager Changes

Completed Infrastructure Development (cont.)

- Plant Health Committee
- System Health Process
- Top 10 Process
- Entergy Coordination and Support
- Project Management Group

Current Improvement Initiatives

- AP-913
- Maintenance Rule Implementation Improvement Plan
- Life Cycle Plans Implementation
- Equipment Troubleshooting for Maintenance and Engineering

Current Improvement Initiatives (cont.)

- Equipment Root Cause
- Workload Management
- Performance Monitoring and Data Analysis
- Line Up Critical Components Analysis with Performance Monitoring

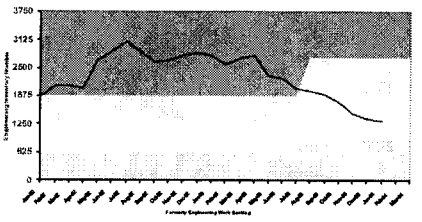
Current Improvement Initiatives (cont.)

- Predictive Maintenance Program Upgrade
- Work Control Improvements
- Operational Focus
- Post-Trip Plant Response Analysis and Benchmarking
- Single Failure Analysis / Scram Reduction Review

Current Improvement Initiatives (cont.)

- Backlog and Operations Challenge Reductions
- Build Integrated Business Planning Process
- Common Entergy Procedure Integration
- Field Instrumentation Expansion

Engineering Inventory



Equipment Reliability Strategies

- Building Long-term Infrastructure
- Complete Existing Projects
- Aggressively Pursue Known Problems
- Effect a Proactive BOP Strategy

Proactive – BOP Reliability Strategy (Draft)

- Critical Components Identified by 3/31/04
- Accelerate BOP PMO by Component Type (e.g. AOV, Positioners)
- PMO Schedule was Developed to Address High Risk Component Types First, Based Upon Industry OE and CNS Specific Failure Data

Proactive – BOP Reliability Strategy (Draft) (cont.)

- New / Revised PMs on High Risk Components Implemented into Work Control Database in Mid Year
- On-line Accessible Work Scheduled
- RE22 Scope Revision Review

Proactive – BOP Reliability Strategy (Draft) (cont.)

- RE23 Scope Strategy will be Heavily Impacted by the PMO Effort and Single Failure Analysis Resulting in Recommended MODs

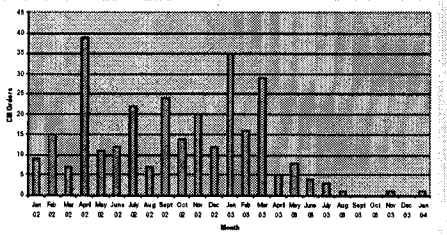
Equipment Reliability Successes

- Service Water
- Optimum Water Chemistry
- Articulating Rod DG
- Condensate Demin Filter Hardware Changes
- Reliability to Switchyard

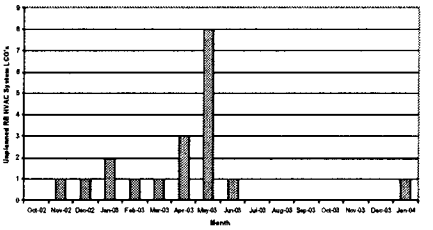
Equipment Reliability Successes (cont.)

- Reactor Building HVAC
- Components in Accelerated Testing
- Isophase Bus Duct Grounding – Main Transformer

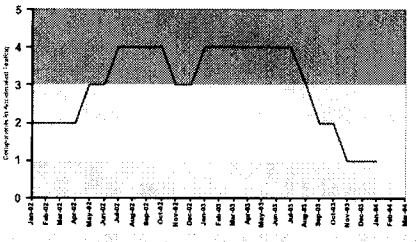
Service Water System Corrective Maintenance



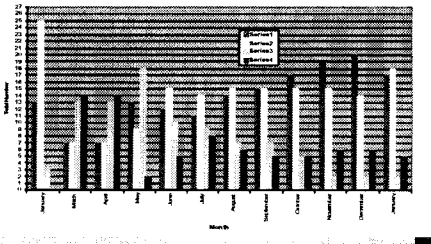
Unplanned SC System LCO's by Month (Due to RB HVAC Performances)



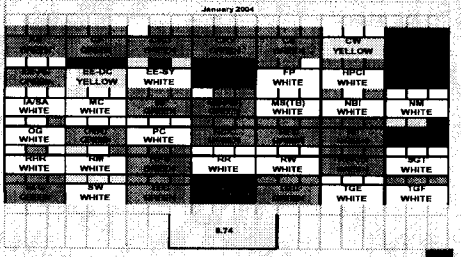
Components in Accelerated Testing



System Health



System Health Annunciator



Conclusion

Randy Edington