

**Nebraska Public Power District**

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NLS2004038  
March 30, 2004

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

**Subject:** Revisions to The Strategic Improvement Plan  
Cooper Nuclear Station, Docket 50-298, DPR-46

- Reference:**
1. Nebraska Public Power District letter NLS2002141 to Ellis W. Merschoff (U.S. Nuclear Regulatory Commission) dated November 25, 2002, "The Strategic Improvement Plan (TIP) Revision 2"
  2. Nebraska Public Power District letter NLS2003010 to Ellis Merschoff (U.S. Nuclear Regulatory Commission) dated January 21, 2003, "Revisions to Proposed Commitments for Inclusion in a Confirmatory Action Letter"
  3. Letter to Clay C. Warren (Nebraska Public Power District) from Ellis W. Merschoff (U.S. Nuclear Regulatory Commission) dated January 30, 2003, "Confirmatory Action Letter"
  4. Nebraska Public Power District letter NLS2003017 to Ellis Merschoff (U.S. Nuclear Regulatory Commission) dated March 14, 2003, "Revisions to Confirmatory Action Letter"

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) of changes to The Strategic Improvement Plan (TIP) Action Plans. On March 18, 2004, Paul V. Fleming, Licensing and Regulatory Affairs Manager at Nebraska Public Power District, and other members of the Cooper Nuclear Station (CNS) staff, discussed these changes with Kriss Kennedy, Chief, NRC Region IV Branch C. On March 25, 2004, Mr. Fleming had further discussions with Mr. Kennedy concerning the subject changes.

Reference 1 transmitted TIP, Revision 2, to the NRC and identified TIP actions that were appropriate for inclusion in a Confirmatory Action Letter (CAL) as regulatory commitments. Reference 2 provided a revised list of commitments for inclusion in the CAL. Reference 3

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subsequently transmitted the CAL. Reference 4 documented a revision to the CAL. Included among the CAL commitments identified in References 3 and 4 were TIP Action Plans 5.2.1.2, 5.2.7.1, 5.3.1.2.e, 5.3.1.2.i, and 5.3.3.3. Steps within these Action Plans have been revised and are the subject of this correspondence.

TIP Action Plan 5.2.1.2 addresses Operability Determinations (ODs). Reference 4 added Action Step 10 of this Action Plan to the scope of the CAL. Step 10 involved formation of a core group of Operations and Engineering personnel that would perform or review and approve ODs for six months in order to improve consistency and quality. In 2Q/03, Step 11 was being pursued to apply a Systematic Approach to Training to the OD process. As a result of this effort, the decision was made to train a large target population of individuals on the fundamentals of the OD process. It was believed that this action to expand the knowledge base of personnel involved with the OD process would effectively meet the intent of Step 10, which was to improve consistency and quality of ODs. In addition, an oversight group had been established in accordance with Step 7 to monitor the OD process and capture lessons learned to improve the OD process. After several months of reviews, the oversight group identified no significant issues concerning OD quality and consistency. Therefore, it was determined that formation of the core group as called for in the original step was not warranted. As a result of the interim effectiveness assessment directed by Step 13 and subsequent evaluation of the results, it was determined that although improvements had been made, the knowledge level of personnel performing ODs is still not at a level that will ensure sustained performance. Therefore, a decision was made to take additional actions to raise the knowledge and proficiency of personnel performing ODs. Step 10 was revised to include actions to develop a new training qualification for performing ODs, followed by qualification of a select group of personnel to the revised training qualification. This revised Step 10 addresses Action Plan causal factors 3 and 6 in addition to those addressed by the original Step 10. This action will be completed by the existing Step 10 due date of 1Q/04. As a further enhancement, a new Step 15 has been added to this Action Plan to implement the Entergy OD procedure in 2Q/04. Review of the Entergy OD procedure determined that it was clearer and more concise and that it would be beneficial to replace the existing CNS OD procedures and desktop guides with the Entergy OD procedure. The Entergy OD procedure has been proven to be effective at other sites and should simplify the process for producing quality ODs at CNS. The Entergy OD procedure addresses Action Plan 5.2.1.2 causal factors 1, 2, 5, 8, and 9.

Because previously completed steps in Action Plan 5.2.1.2 resulted in changes to the existing CNS procedures and desktop guides, they have been reviewed to determine if the actions are appropriately addressed in the Entergy procedure and/or other CNS procedures. Following is a discussion of those items that will not be carried forward along with a justification why this is appropriate:

Action Step 4 implemented requirements for additional reviews of ODs. It has been determined that additional reviews by Operations Management, a second Shift Supervisor, and System Engineering Management are no longer necessary. The improvements made through this Action Plan to increase the knowledge base for personnel who perform and approve ODs is the appropriate mechanism to drive improved

performance, rather than requiring more reviews. The reviews specified by the Entergy procedure (Shift Manager and Responsible Engineering Manager) will provide an appropriate level of review.

Action Step 9 resulted in the development of an overview procedure to more effectively direct the entire Generic Letter (GL) 91-18 process and make ties to other CNS procedures that interface with the process to ensure that GL 91-18 issues are corrected in a manner commensurate with safety. With the adoption of the Entergy OD procedure, an additional overview procedure is no longer required. The revised CNS 0.5.OPS procedure, which will incorporate the Entergy OD procedure, will be used to perform ODs, and CNS Procedures 0.5.NAIT and 0.40 will prioritize and resolve the conditions. No direct tie between the procedures is required since each procedure independently fulfills its intended function.

TIP Action Plan 5.2.7.1 addresses improved use of the corrective action program to effectively resolve station problems. Action Step 1a has been revised in this Action Plan. Step 1a pertains to reinforcement of the "take action now" philosophy through coaching and monitoring in Condition Review Group review of notifications, with use of the Closed Based on Actions Taken (CBOAT) indicator to monitor effectiveness. This step was revised to reflect that performance will be measured by an indicator that combines CBOAT and TREND actions as both are methods to provide immediate disposition of issues. Trending documents an immediate management decision that corrective action is not currently warranted. The combination of CBOAT and TREND into a common performance indicator is consistent with industry practices. The deliverable for this step was also revised to remove the 35% criterion for the CBOAT indicator. As written, the deliverable was unclear as to the length of time in the monitoring period that performance must meet the 35% criterion and it was also determined that setting a goal that could be perceived as establishing a "quota" was not appropriate. Rather the deliverable was revised to reflect improved application of CBOAT and TREND classification of notifications as evidenced by an improved performance trend over the period of this Action Step.

TIP Action Plan 5.3.1.2.e addresses a long standing equipment issue related to water sulfates. Action Steps 7 and 8 have been revised in this Action Plan. Step 7 previously stipulated that a Change Evaluation Document (CED) would be developed to install catch basins in various plant locations to prevent groundwater in-leakage from entering the floor drain system. This step was revised to state that a CED would be developed to prevent groundwater in-leakage from building penetrations. Rather than installing catch basins, the problem will be corrected by eliminating ground water in-leakage into the floor drain systems through installation of improved penetration seals. This solution eliminates the need to install catch basins in various plant locations. The deliverable was also revised such that it still requires an approved CED, but removed the specific reference to installation of catch basins. The deliverable for Step 8 was also subsequently revised to remove the reference to installation of catch basins, but still requires CED implementation.

TIP Action Plan 5.3.1.2.i addresses a long standing equipment issue related to air systems. Action Step 8b requires approval of a CED to replace the current station air compressors. This

step was originally scheduled to be completed by 1Q/04, but has been extended to 2Q/04. Delays were encountered in the review/comment resolution process, as well as in selecting the final vendor to supply the new air compressors. Step 8c in this Action Plan pertains to installation of the new service air compressors. The start and end dates of Step 8c will not be impacted by the delay in CED approval.

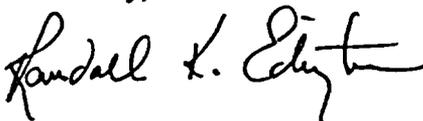
TIP Action Plan 5.3.3.3 addresses completion of the Unauthorized Modifications Follow-up Project. The deliverable for Action Step 5 was revised in this Action Plan. This step requires the revision of configuration documents to reflect the Engineering Evaluations/Change Evaluation Documents developed in Action 4 and the authorized configuration changes identified in Actions 1 and 2. This population includes certain drawing changes that require entry into a steam affected radiation area to "as-build." Entering steam affected radiation areas at power for this activity would result in unwarranted radiation dose and is inconsistent with station As Low As Reasonably Achievable (ALARA) policy. Therefore, the deliverable was revised to reflect that drawing changes requiring "as-building" in steam affected radiation areas will be brought to "pending" status, notifications generated to complete the "as-building," and work activities scoped and scheduled for completion in the next refueling outage. As the related modifications have now been authorized and the drawings brought under the station's configuration control program, there is no safety significance associated with delaying final drawing revision until plant conditions allow and controlling the conduct of such revisions outside the scope of this TIP Plan.

Attachment 1 provides the specific revisions to the Action Plans discussed above.

The attached List of Regulatory Commitments contains those revised commitments within the scope of the CAL.

Should you have any questions concerning these revised TIP Action Plans, please contact Mr. Paul Fleming at (402) 825-2774.

Sincerely,



Randall K. Edington  
Vice President - Nuclear and  
Chief Nuclear Officer

/lb

Attachment

cc: U.S. Nuclear Regulatory Commission w/attachment  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

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

Kriss Kennedy w/attachment  
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USNRC

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**REVISIONS TO THE STRATEGIC IMPROVEMENT PLAN  
ACTION PLANS**

Revision to TIP Action Plan 5.2.1.2, Step 10 and New Step 15  
 Operability Determinations

NO.	ACTION	START DATE	END DATE	DELIVERABLE
10	<p>Improve consistency and quality of Operability Determinations by forming a core group of Operations and Engineering personnel that would perform or review and approve operability determinations for 6 months.</p> <p><u>Develop new training qualification for performing operability determinations and qualify select personnel to the new qualifications.</u></p>	<p><del>2Q/03</del>  <u>1Q/04</u></p>	<p><del>1Q/04</del>  <u>1Q/04</u></p>	<p>Revise procedures in accordance with lessons learned from this effort. Issue a final report summarizing the group's conclusions to the Operations Manager and Engineering Senior Manager:</p> <ul style="list-style-type: none"> <li>• <u>New training qualification developed for performing operability determinations.</u></li> <li>• <u>Personnel selected as part of the Operability Determination Improvement Plan qualified to new training qualifications for performing operability determinations.</u></li> </ul>
<u>15</u>	<p><u>Implement the Entergy Operability Determination procedure.</u></p>	<u>1Q/04</u>	<u>2Q/04</u>	<p><u>Entergy Operability Determination procedure (ENN-OP-104) implemented.</u></p>

Revision to TIP Action Plan 5.2.7.1, Step 1a  
Improve Use of CAP to Effectively Resolve Station Problems

NO.	ACTION	START DATE	END DATE	DELIVERABLE
1a	Re-enforce the "take action now" philosophy through coaching and monitoring in Condition Review Group (CRG) review of notifications. Use established Closed Based on Actions Taken (CBOAT)/TREND indicator to monitor <u>and trend</u> effectiveness at taking action on the spot.	3Q/02	1Q/04	<u>Use of the CBOAT indicator showing <math>\geq 35\%</math>. (Overall results will be improved utilization of CAP process to resolve issues quickly). Improved application of CBOAT and TREND classification of notifications as evidenced by an improved performance trend over the period of this Action Step.</u>

**Revision to TIP Action Plan 5.3.1.2.e, Steps 7 and 8  
Water Sulfates (Long Standing Equipment Issue)**

NO.	ACTION	START DATE	END DATE	DELIVERABLE
7	Develop <u>Change Evaluation Document (CED)</u> to <del>install catch basins in various plant locations to prevent groundwater in-leakage from entering floor drain system building penetrations.</del>	2Q/03	1Q/04	<u>Approved CED to install modification allow installation of catch basins.</u>
8	Implement CED.	1Q/04	3Q/04	<del>Catch basins installed and verified to be functional.</del> <u>CED installed and inspected satisfactorily.</u>

**Revision to TIP Action Plan 5.3.1.2.i, Step 8b  
Air Systems (Long Standing Equipment Issue)**

NO.	ACTION	START DATE	END DATE	DELIVERABLE
8b	Develop a CED to replace the SA Compressors with current generation design units.	3Q/03	<del>1Q/04</del> <u>2Q/04</u>	Approved CED to replace the current station air compressors.

Revision to TIP Action Plan 5.3.3.3, Step 5  
Unauthorized Modifications Follow-Up Project Completion

NO.	ACTION	START DATE	END DATE	DELIVERABLE
5	Revise configuration documents to reflect the EE's/CED's developed in Action 4 as well as authorized configuration changes identified in Actions 1 and 2.	2Q/03	1Q/04	<p>Revised drawings, databases and procedures as appropriate. <u>Drawing changes requiring "as-building" in steam affected radiation areas are not required to be stasured as "Complete," but must be brought to "Pending" status.</u></p> <p><u>Notifications are assigned for "Pending" drawing changes. "Pending" drawing changes are scoped and scheduled as work activities for completion in the next refueling outage (RE22).</u></p>

**ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©**

Correspondence Number: NLS2004038

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
Action Plan 5.2.1.2, Step 10 - Develop new training qualification for performing operability determinations and qualify select personnel to the new qualifications.	1Q/04
Action Plan 5.2.7.1, Step 1a - Re-enforce the "take action now" philosophy through coaching and monitoring in Condition Review Group (CRG) review of notifications. Use established Closed Based on Actions Taken (CBOAT)/TREND indicator to monitor and trend effectiveness at taking action on the spot.	1Q/04
Action Plan 5.3.1.2.e, Step 7 - Develop Change Evaluation Document (CED) to prevent groundwater in-leakage from building penetrations.	1Q/04
Action Plan 5.3.3.3, Step 5 - Revise configuration documents to reflect the EE's/CED's developed in Action 4 as well as authorized configuration changes identified in Actions 1 and 2.	1Q/04