



Nebraska Public Power District

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NLS2004089

July 26, 2004

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

Subject: Reply to a Notice of Violation
NRC Letter No. EA-04-120
Cooper Nuclear Station, NRC Docket No. 50-298, DPR-46

Reference: 1. Letter to Randall K. Edington (Nebraska Public Power District) from Dwight D. Chamberlain (U.S. Nuclear Regulatory Commission) dated June 25, 2004, "NRC Supplemental Inspection Report 05000298/2004-011 and Notice of Violation"

The purpose of this letter is to provide Nebraska Public Power District's (NPPD) reply to a Notice of Violation in accordance with 10 CFR 2.201. By letter dated June 25, 2004 (Reference 1), the Nuclear Regulatory Commission (NRC) cited NPPD for being in violation of NRC requirements.

The violation is concerned with the inadequate use of cycle written examinations to evaluate comprehension of training subjects presented during Licensed Operator Requalification training. Reference 1 discusses the performance deficiency associated with this violation. This report concluded that failure to administer comprehensive cycle examinations on a regular, periodic basis that test on the topics covered in training, had a significant impact on the effectiveness of the Licensed Operator Requalification training.

NPPD recognizes the importance of its responsibilities in the licensed operator requalification process and accepts the violation. NPPD has taken prompt action to ensure compliance with 10 CFR 55.59 and to prevent recurrence of this violation.

Enclosure 1 of Reference 1 requested that NPPD's reply to the Notice of Violation be clearly marked as a "Reply to a Notice of Violation; EA-04-026." During a telephone conversation between Jerry Roberts (NPPD), et al, and Ryan Lantz (NRC), et al, on July 25, 2004, this was identified as a typographical error. The correct designation for the Notice of Violation is "EA-04-120."

COOPER NUCLEAR STATION

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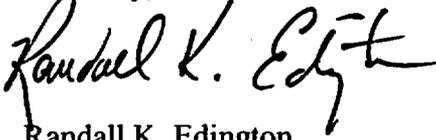
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Should you have any questions concerning this matter, please contact Mr. Paul Fleming at (402) 825-2774.

Sincerely,

A handwritten signature in black ink that reads "Randall K. Edington". The signature is written in a cursive style with a large, stylized initial 'R'.

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

/dwv

Attachment

cc: Regional Administrator w/ attachment
USNRC - Region IV

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

Senior Resident Inspector w/ attachment
USNRC

NPG Distribution w/ attachment

Records w/ attachment

REPLY TO A NOTICE OF VIOLATION: EA-04-120
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

During Nuclear Regulatory Commission (NRC) inspection activities conducted from April 5 through May 12, 2004, a violation of NRC requirements was identified. The particular violation and Nebraska Public Power District's (NPPD) reply are set forth below:

Restatement of the Violation

Section 10 CFR 55.59(c) provides, in part, that "The requalification program must meet the requirements of paragraphs (c)(1) through (7) of this section. In lieu of paragraphs (c)(2), (3) and (4) of this section, the Commission may approve a program developed by using a systems approach to training." Section 10 CFR 55.4 defines a systems approach to training as "a training program that includes the following five elements..." Element (4) is "Evaluation of trainee mastery of the objectives during training."

Through Generic Letter 87-07 and the licensee's notification dated August 13, 1987, the NRC approved the licensee's requalification program, developed using a systems approach to training.

Cooper Training Program Procedure 201, "CNS Licensed/SRO Certified Personnel Requalification Program," Revision 25, Step 4.1.1 requires that, "Cycle examinations shall be used to evaluate comprehension of training subjects presented during LOR (licensed operator requalification) training...." Step 2.1.7 defines a cycle written examination as, "A written exam to demonstrate proficiency on material covered during cycle(s) training." The licensee divided the biennial requalification training program into 12 training cycles, each of which was approximately 6 weeks in duration.

Contrary to the above, during the biennial requalification program period from February 25, 2002 through January 11, 2004, the licensee's use of cycle written examinations was not adequate to evaluate comprehension of training subjects presented during LOR training. During this biennial requalification program period, the licensee administered a total of three cycle written examinations. Two of the cycle examinations were administered following two cycles of training. The third cycle examination was administered following six cycles of training (a period of approximately 36 weeks) and failed to test comprehension of several training subjects, including, for example, changes to severe accident management guidelines and modifications to the reactor vessel level control system.

This violation is associated with a White significance determination process finding that was previously issued in a NRC letter of March 24, 2004.

Admission or Denial of Violation

NPPD accepts the violation.

Reason for Violation

Background

The operating examinations for the Licensed Operator Requalification program at Cooper Nuclear Station were administered November through December 2003. Failures during the biennial cycle included a thirty-six percent failure on the biennial written examination. Examiner Standard 601 E.3.a(1) specifies, in part, that for a requalification program to maintain satisfactory performance, seventy-five percent or greater of the participants must pass all portions of the biennial examinations.

During the examination cycle, licensed operators and Shift Technical Engineer personnel who failed any portion of the examination were removed from license and/or shift duties. Following the examination cycle some of the questions were regraded resulting in additional failures. The final overall failure rate was forty-six percent. Those licensed operators and Shift Technical Engineer personnel affected by this regrade, were also removed from license and/or shift duties. Some of these personnel had previously returned to license and/or shift duties following their initial examination. This is the subject of a Green non-cited violation documented in Inspection Report 2004-011. Personnel affected by the failures were subjected to remedial training and retested prior to returning to shift watch-standing duties, or a determination was made by plant management that the license was no longer required.

Final significance determination for the high failure rate resulted in a White finding as stated in a NRC letter of March 24, 2004. The NRC, from April 5 through May 12, 2004, conducted a supplemental inspection. This inspection concluded that failure to administer comprehensive cycle examinations on a regular, periodic basis that test on the topics covered in training, had a significant impact on the effectiveness of the Licensed Operator Requalification training. The NRC determined this to be a violation of 10 CFR 55.59(c).

Cause for Violation

NPPD performed a formal root cause evaluation for the condition that resulted in a White finding. This root cause evaluation encompasses the condition identified in the Notice of Violation. The root cause and corrective actions resulting from the evaluation are applicable to the violation. The evaluation determined the reason for the violation was several organizational and process breakdowns over the two-year cycle. The common tie with these breakdowns was ineffective fundamental management oversight of the training and examination processes.

Corrective Steps Taken and Results Achieved

The following corrective steps were taken to correct the conditions that caused the violation. These actions have been completed.

1. The Operations Training organization was changed to align with the Entergy standard model that facilitates increased supervisory attention on the conduct of the training programs. This action will drive more management oversight of the processes and align CNS with the proven model utilized by the Entergy fleet.
2. NPPD validated that the membership and agenda of oversight committee meetings address the precursors that contributed to the high failure rate and knowledge weaknesses found during training. Membership of the committee was changed to include the Training Manager and establish a quorum. The agenda for the committee meetings was revised to include declining and marginal student performance and to review certain aspects of the Operations two-year plan. This action will facilitate training and line management alignment in controlling training programs.
3. NPPD incorporated the examination strategy into the two-year plan that prepares operators for the comprehensive examination and included this in the appropriate procedure. The two-year plan includes alternating quizzes and open/closed reference exams. The appropriate training procedure was revised to require a minimum of six cyclic written examinations per two-year program cycle and no licensed operator will exceed three cycles without a written examination.

Corrective Steps That Will Be Taken to Avoid Further Violations

Corrective steps to prevent recurrence of the violation and to ensure compliance with 10 CFR 55.59 have been completed as noted above.

Date When Full Compliance Will Be Achieved

NPPD believes it is in full compliance.

