



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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ARLINGTON, TEXAS 76011-4005

August 30, 2005

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

**SUBJECT: MIDCYCLE PERFORMANCE REVIEW AND INSPECTION PLAN -  
COOPER NUCLEAR STATION**

Dear Mr. Edington:

On August 4, 2005, the NRC staff completed its performance review of the Cooper Nuclear Station (CNS) for the first half of the calendar year 2005 assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results over the previous 12 months. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility in order for you to inform us of any planned inspections that may conflict with your plant activities.

This performance review and enclosed inspection plan do not include physical protection information. A separate letter designated and marked as "Exempt from Public Disclosure in Accordance with 10 CFR 2.390" will include the physical protection review and resultant inspection plan.

Overall, CNS operated in a manner that preserved public health and safety. Plant performance for the most recent quarter was within the Licensee Response Column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (Green).

While plant performance for the most recent quarter was within the Licensee Response Column of the Action Matrix, CNS was in the Regulatory Response Column of the NRC's Action Matrix at the beginning of this assessment period. This was based on one finding of low to moderate significance (White) in the Mitigating Systems Cornerstone. This finding involved a significant number of licensed operator requalification written examination failures. A supplemental inspection determined the root cause, extent of condition, and associated corrective actions were appropriately performed to address the deficiencies noted in the operator requalification program. As a result, this finding was closed in NRC Inspection Report 05000298/2004015, dated March 16, 2005.

As updated in our 2004 annual assessment letter, dated March 2, 2005, we advised you of our continuing concerns associated with two substantive crosscutting issues in the areas of human

performance and problem identification and resolution. As discussed in that letter, the NRC acknowledged that the Nebraska Public Power District (NPPD) implemented actions to address these areas and some improvement was noted; however, human performance deficiencies and inconsistent implementation of the corrective action program continued to be identified.

During this assessment period, there were 13 Green findings identified in the area of human performance, most of which occurred during the past 6 months. A number of these findings involved the causal factor of personnel performance. Specifically, there were multiple Green findings involving instances of personnel failing to follow procedural guidance affecting the Mitigating Systems, Emergency Preparedness, and Occupational Radiation Safety Cornerstones. Examples include: a failure to follow an operability procedure for the service water system strainers; a failure to properly implement an emergency plan implementing procedure during a fire; and a failure to post and barricade two areas in the drywell as locked high radiation areas.

In the area of problem identification and resolution, one recurring theme, which also has been documented in previous NRC assessments, involves inadequate corrective actions resulting in repetitive problems which impact plant operation. During this assessment period, there were six Green findings involving problem identification and resolution, four of which involved the causal factor of corrective action. Recent examples include three findings within the last 6 months involving repetitive failures to correct adverse conditions affecting the Mitigating Systems and Barrier Integrity Cornerstones. These involved the failure to comprehensively address the rendering of the high pressure coolant injection system inoperable by operators during scram recovery actions, the failure to properly address the root cause of operating the reactor in excess of licensed thermal power, and the failure to promptly correct degraded conditions affecting a service water booster pump.

The NRC recognizes that NPPD continues to implement actions to improve human performance and improve the effectiveness of the corrective action program at CNS. Notwithstanding these improvements, there continues to be a number of findings across several cornerstones and the performance deficiency impacts plant operations. Focused NRC oversight of these areas through baseline inspections will continue until our inspections indicate that your actions have been effective in improving the level of procedural adherence and preventing repetitive or similarly recurring problems that significantly impact plant performance.


The enclosed inspection plan details the inspections, except those related to physical protection, scheduled through March 31, 2007. The inspection plan is provided to minimize the resource impact on your staff and to allow for the early resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last 9 months of the inspection plan are tentative and may be revised at the end-of-cycle review meeting.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made 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).

If circumstances arise which cause us to change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Wayne Walker at (817) 276-6523 with any questions you may have regarding this letter or the inspection plan.

Sincerely,



Arthur T. Howell III, Director  
Division of Reactor Projects

Docket: 50-298  
License: DPR-46

Enclosure:  
Cooper Nuclear Station Inspection/Activity Plan

cc w/enclosure:

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Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
1	ALARA3 - ALARA PLANNING AND CONTROLS		1	08/22/2005	08/26/2005	Baseline Inspections
	IP 7112102	ALARA Planning and Controls				
1	OB-RQ - REQUAL INSPECTION		3	11/14/2005	11/18/2005	Baseline Inspections
	IP 7111111B	Licensed Operator Requalification Program				
1	PEB - MAINTENANCE RULE BIENNIAL		1	04/10/2006	04/14/2006	Baseline Inspections
	IP 7111112B	Maintenance Effectiveness				
1	EB02/17 - PERMANENT MODS/50.59		3	04/24/2006	04/28/2006	Baseline Inspections
	IP 7111102	Evaluation of Changes, Tests, or Experiments				
1	IP 7111117B	Permanent Plant Modifications		04/24/2006	04/28/2006	Baseline Inspections
1	PEB - HX PERFORMANCE		1	06/26/2006	06/30/2006	Baseline Inspections
	IP 7111107B	Heat Sink Performance				
1	EP1 - EMERG PREPAREDNESS EXERCISE		3	07/17/2006	07/21/2006	Baseline Inspections
	IP 7111401	Exercise Evaluation				
1	IP 7111404	Emergency Action Level and Emergency Plan Changes		07/17/2006	07/21/2006	Baseline Inspections
1	IP 71151	Performance Indicator Verification		07/17/2006	07/21/2006	Baseline Inspections
1	ACRSA - ACCESS CONTROLS TO RAD SIGNIFICANT AREAS		1	10/16/2006	10/20/2006	Baseline Inspections
	IP 7112101	Access Control to Radiologically Significant Areas				
1	ALARA1 - ALARA PLANNING AND CONTROLS		1	10/30/2006	11/03/2006	Baseline Inspections
	IP 7112102	ALARA Planning and Controls				
1	ACRSA - ACCESS CONTROLS TO RAD AREAS		1	03/19/2007	03/23/2007	Baseline Inspections
	IP 7112101	Access Control to Radiologically Significant Areas				

This report does not include INPO and OUTAGE activities.  
 This report shows only on-site and announced inspection procedures.

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SISP Review Completed:   wcw   ADAMS:  Yes  No Initials:   wcw    
 Publicly Available  Non-Publicly Available  Sensitive  Non-Sensitive

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RIV:SPE/DRP/C	C:DRP/C	D:DRS	C:DRP/C	D:DRP
RVAzua	WCWalker	DDChamberlain	WCWalker	ATHowell
<i>/RA/</i>	<i>/RA/</i>	<i>KMKennedy for</i>	<i>RVA for</i>	<i>W</i>
8/24/05	8/24/05	8/25/05	8/28/05	8/28/05

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