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Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-4005

Subject: Response to 2005 Annual Assessment Letter
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Letter from U.S. Nuclear Regulatory Commission to R. Edington (Nebraska Public Power District) dated March 2, 2006, "Annual Assessment Letter - Cooper Nuclear Station (NRC Inspection Report 05000298/2006001)".
 2. Letter from U.S. Nuclear Regulatory Commission to R. Edington (Nebraska Public Power District) dated March 2, 2005, "Annual Assessment Letter - Cooper Nuclear Station (NRC Inspection Report 05000298/2005001)".
 3. Letter from U.S. Nuclear Regulatory Commission to R. Edington (Nebraska Public Power District) dated August 30, 2005, "Midcycle Performance Review and Inspection Plan - Cooper Nuclear Station".

The purpose of this letter is to provide a written response in accordance with Reference 1 because of the identification of a substantive cross-cutting issue in the area of Problem Identification and Resolution (PI&R) for more than two consecutive assessment letters at Nebraska Public Power District's (NPPD) Cooper Nuclear Station (CNS). The substantive cross-cutting issue was based on several inspection findings in which inadequate corrective actions resulted in repetitive problems that impacted plant operations.

NPPD is aware of and acknowledges PI&R as an area for improvement not only due to the repetitive issues noted above, but also as part of an overall site strategy in continuous improvement at CNS. NPPD believes that the current Corrective Action Program (CAP) at the station is robust and is correcting identified problems. NPPD agrees that there are some inconsistent implementation issues in resolving conditions as noted in Reference 1. Actions being taken in our 2006 CAP Improvement Plan will address the substantive cross-cutting issue and lead to continued improvement in the CAP at CNS.

The CNS 2004 Annual Assessment letter (Reference 2) identified a substantive cross-cutting issue in PI&R due to the number of findings involving failures to promptly identify and correct safety-related

and important-to-safety equipment problems and failures, including instances in which corrective actions were not adequate to prevent recurrence. In response to this assessment letter, CNS implemented a number of actions to address the substantive cross-cutting issue. Primary actions included:

- The General Manager of Plant Operations issued a site communication on the importance of writing condition reports in a timely manner.
- Tailgates were held with departments that were determined to have most of the problem identification issues noted in Reference 2.
- Discussions were held with site management and supervision on their role in the condition report process.
- CAP threshold surveys were completed to aid in the identification of additional improvement activities in the area of problem identification.
- Meetings were held with site personnel to "brainstorm" reasons why problem identification issues were occurring. Results were presented in site "All Hands Meetings".
- The condition reporting system was modified to reinstitute a single entry process for all conditions (CAP/work requests) at CNS.

The CNS 2005 Midcycle Performance Review letter (Reference 3) identified a substantive cross-cutting issue in the PI&R area due to inadequate corrective actions resulting in repetitive problems that impact plant operation. In response to this performance review letter, the substantive cross-cutting issue was entered into CAP. A 2005 Corrective Action Improvement Plan resulted that tactically addressed the substantive cross-cutting issue. Actions in that plan were primarily focused on the following areas:

- An improved 6 month equipment trending process.
- More detailed just-in-time training for completing apparent causes.
- Corrective Action Review Board review of any root cause action intent changes and closures for interim corrective actions.
- Site Continuous Improvement Coordinator review of apparent cause evaluation closures.

Late in 2005, senior management at CNS expanded the tactical plan to a more broad-based strategic improvement plan to further address overall CAP performance. A cause analysis (modified stream analysis) was performed of the PI&R issues discussed in Reference 3 and of other CAP performance issues identified since the Confirmatory Action Letter was closed. This assessment resulted in a 2006 CAP Improvement Plan for CNS that encapsulates issues from the previous plan. Actions in the 2006 CAP Improvement Plan are expected to be completed by the end of the second quarter 2006. Several items were completed in the first quarter 2006. CAP is core business at the station and CNS will continually check and adjust to drive our program to industry excellence.

The examples noted in Reference 1 of inadequate corrective actions resulting in repetitive problems which impact plant operation were assessed against the stream analysis and were determined to be captured by the following problem statements and causes. A summary of corrective actions in the improvement plan that address the examples are also provided. The examples noted in Reference 1 are identified in parenthesis.

- Ownership and Attitudes Toward CAP. Corrective actions address the cause of inconsistencies with buy-in and ownership with respect to CAP that will drive ownership of CAP at the site into the lowest levels of the organization (all issues).
- Clear Definition of Corrective Actions to Prevent Recurrence (CAPR), Quality/Timeliness of CAPR Closures and Corrective Action Review Board Oversight. Corrective actions to address the causes are focused on providing additional guidance and oversight management review of CAPR and developing a risk-informed prioritization when assigning CAPR (High Pressure Coolant Injection pull-to-lock issue).
- Trend Identification and Resolution. Corrective actions address the cause of inconsistency in the identification and addressing of trends (safety-related motor operated valve starters/service water booster pump issue).
- Apparent Cause Quality. Corrective actions address the cause of inconsistencies in the quality and action plans of apparent causes (thermal power limit issue).

Additional assessment results from the stream analysis identified inconsistencies in the quality of completed assigned actions and root cause evaluations and in communication of action plans relative to cross-cutting issues. There were also resource and process implementation inefficiencies. Details concerning corrective actions related to the problem statements and causes and other CAP implementation issues identified in the stream analysis are discussed in the 2006 CAP Improvement Plan.

NPPD is committed to continuous improvement in the PI&R area. The CNS 2006 CAP Improvement Plan will address the specific PI&R cross-cutting substantive issue identified in Reference 1 and additional areas the station has identified in the stream analysis. NPPD looks forward to a meeting with the NRC, as noted in Reference 1, to further discuss our continuous improvement efforts in the PI&R area.

Should you have any questions or require additional information, please contact Paul Fleming, Licensing Manager, at (402) 825-2774.

Sincerely,

A handwritten signature in black ink that reads "Randall K. Edington" with a stylized flourish at the end.

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

/js

cc: U.S. Nuclear Regulatory Commission
Document Control Desk

Cooper Project Manager
USNRC – NRR Project Directorate IV-1

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