UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

June 26, 2013

Mr. Oscar A. Limpias, Vice President-Nuclear
and Chief Nuclear Officer
Nebraska Public Power – Cooper Nuclear Station
72676 648A Avenue
Brownville, NE 68321

SUBJECT: MEETING SUMMARY FOR JUNE 26, 2013 PUBLIC MEETING WITH NEBRASKA PUBLIC POWER DISTRICT REGARDING COOPER NUCLEAR STATION

Dear Mr. Limpias:

On June 26, 2013, representatives of Cooper Nuclear Station met with NRC personnel in the NRC Region IV office in Arlington, Texas, to discuss progress and status plans for addressing substantive cross-cutting issues in the areas of human performance and problem identification and resolution. The meeting was held at the request of the NRC. At the meeting, your staff delivered a presentation to provide the information requested by the NRC. The list of attendees and a copy of the subject presentation 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's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management 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,

Bob Hagar

Bob Hagar
Chief (Acting), Project Branch C
Division of Reactor Projects

Docket No.: 50-298
License No: DRP-46

Enclosures:
1. Attendance List
2. Presentation Slides

cc/w/Enclosures:
Electronic distribution by RIV:
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RIV/ETA: OEDO (Vivian.Campbell@nrc.gov)

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ADAMS: ☐ No ☒ Yes	☒ SUNSI Review Complete	Reviewer Initials: BH
	☒ Publicly Available	☒ Non-Sensitive
	☐ Non-publicly Available	☐ Sensitive

C:DRP/PBC			
BHagar			
BHagar			
6-26-13			

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

NRC PUBLIC MEETING ATTENDANCE	
LICENSEE/FACILITY	NEBRASKA PUBLIC POWER DISTRICT COOPER NUCLEAR STATION
DATE/TIME	6/26/13, 8:00AM – 11:00AM
LOCATION	NRC REGION IV OFFICE 1600 E. LAMAR BLVD ARLINGTON, TX 76011

NAME (PLEASE PRINT)	ORGANIZATION	TITLE
Jeffrey Josey	NRC	SRI
Thomas Blount	NRC	Dir-DRS; RIV
Kriss Kennedy	NRC	Dir. DRP
PATRICK POPE	NPPD	CEO
OSCAR LIMPIAS	NPPD	SVP/CNO
KENNETH HIGGINBOTHAM	NPPD	CEMPO
Rod Penfield	NPPD	Dir. Nuclear Safety Assurance
Dan Burman	NPPD	Dir of Engineering
David Van Der Kamp	NPPD	Licensing Manager
Jessica Pebley	NPPD	Administrative Assistant
Bob Hagar	NRC	Chief, Br. C

NRC Public Meeting

Substantive Cross-Cutting Issues

IR 2012-801

Cooper Nuclear Station

June 26, 2013

Introductions and Opening Comments

Oscar Limpias

Vice President – Nuclear and Chief Nuclear Officer

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Agenda

- Actions Addressing SCCIs
- Nuclear Safety Culture Assessment
- Road to Excellence Plan
- Closing Remarks

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Actions Addressing SCCIs

Rod Penfield

Director of Nuclear Safety Assurance

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Problem Statement

- NRC Annual Assessment Letter for CNS, dated March 4, 2013, identified three (3) Substantive Cross-cutting Issues:
  - PI&R area (1)
  - Human Performance area (2)

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Root Causes

- CNS standards related to the resolution of apparently low significance regulatory issues are low and do not meet Fleet or industry expectations. This manifests in a lack of urgency to fully understand and resolve SCCIs and NRC Findings of Low Significance.
- CNS Engineering and Operations departments are not adequately proficient in the application of the Licensing Design Basis of the plant. Weak Design Basis knowledge, together with limited experience related to the application of the Design Basis, particularly in Engineering, result in reduced levels of proficiency.

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Contributing Causes

- Communication with the station NRC Resident Inspectors is not fully effective.
- Performance Indicators related to SCCIs and NRC Findings of Low Significance are not included in normal management review of station performance.
- Condition Reports that document Non-Cited Violations (NCVs) and other NRC findings of Low Significance are typically classified at the level too low to drive evaluation for underlying process, program, and organizational factors that contributes to a problem becoming an NCV or other NRC Finding.

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Corrective Actions

- Revise the Condition Report Classification Matrix to require the following:
  - All Condition Reports initiated to document SCCIs shall be classified as Category A. (Complete)
  - All Condition Reports initiated to document NCVs shall be classified at a minimum Category B. (Complete)

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Corrective Actions

- Revise the Standard Corrective Action Template (and the NCV Checklist) for Category B Condition Reports that document NCVs to require an evaluation of the underlying causes that resulted in the condition becoming an NCV including why the issue that resulted in the NCV was not self-identified. (Complete)
- Include an agenda item in the Leadership and Alignment Meeting agenda to review Performance Indicators for SCCIs and NCVs. (Complete)

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Corrective Actions

- Deliver Operability Determination Training to Senior Reactor Operators, Shift Technical Engineers (STEs), and qualified Engineers. (Complete)
- Conduct a training analysis to determine the initial and continuing training requirements in the Engineering and Operations training program for Design and Licensing Basis training. (Complete)
- Deliver discipline specific training to STEs, Shift Managers, and Engineers on plant design basis, USAR, and Technical Specifications.

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Corrective Actions

- Develop and deliver training to managers, supervisors, and Department Performance Improvement Coordinators (DPIC) in Trending Techniques that facilitate identification of the collective significance of groups of low significance issues.
- Establish and implement an on-going Licensing/NRC Communication Plan using the Fleet Change Management Process.

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Nuclear Safety Culture Assessment

Rod Penfield

Director of Nuclear Safety Assurance

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NSCA - *Overview*

- The assessment team noted that CNS has a strong Nuclear Safety Culture, a healthy respect for nuclear safety, and that nuclear safety is not compromised by production priorities.
- Station personnel generally feel that they can challenge any decision if needed, without fear of retaliation.

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NSCA – *Actions/Lessons Learned*

- The team identified opportunities for improvement.
- Each of these items has been entered into our Corrective Action Program.
- Action added to the SCCI root cause to evaluate this new information.
- Assessment results were promptly communicated to the station through All-Hands Meetings.

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Road to Excellence Plan

Kenneth Higginbotham
General Manager of Plant Operations

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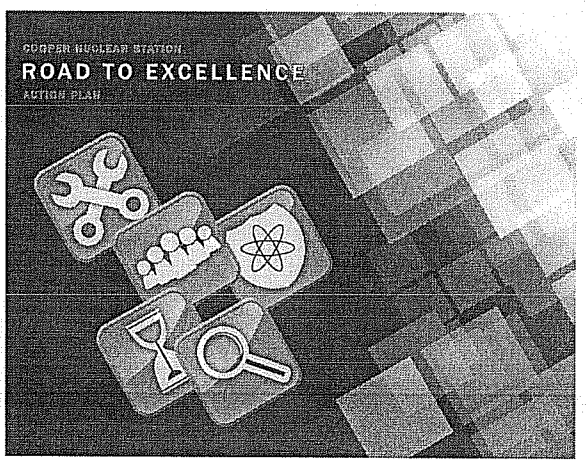
Road to Excellence Plan



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Focus Areas

- Organizational Alignment
- Corrective Action Program
- Modification Implementation
- Radiological Performance
- Outage Execution

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Organizational Alignment

- Ensure CNS goals, Focus Areas, and INPO Index elements are well-understood
- Leadership Effectiveness and Alignment
- Improve Bench Strength

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Corrective Action Program

- Raise station standards for Corrective Action Program performance
- Improve Causal Analysis
- Improve Trending
- Training Actions

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Sustainability

- Effectiveness reviews for each of the focus areas
- Effectiveness review of the Corrective Action Process
- Effectiveness review of Actions
- On-going PI review at Leadership and Alignment Meetings
- Fleet oversight

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Closing Remarks

Oscar Limpias

Vice President – Nuclear and

Chief Nuclear Officer

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