UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

March 4, 2014

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

SUBJECT: ANNUAL ASSESSMENT LETTER FOR THE COOPER NUCLEAR STATION (REPORT 05000298/2013001)

Dear Mr. Limpias:

On February 11, 2014, the NRC completed its end-of-cycle performance review of the Cooper Nuclear Station. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from January 1, 2013, through December 31, 2013. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that overall, the Cooper Nuclear Station operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at the Cooper Nuclear Station during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The NRC identified a cross-cutting theme in the human performance area associated with the work practices component. Specifically, the theme consists of four inspection findings in the mitigating systems cornerstone related to licensee defining and effectively communicating expectations regarding procedural compliance and personnel following procedures [H.4(b)]. The NRC determined that a substantive cross-cutting issue (SCCI) associated with [H.4(b)] does not exist because the NRC does not have a concern with your staff's scope of effort and progress in addressing the cross-cutting theme. While there were more than three inspection findings with this theme, we understand this represents a recent performance trend. Once identified, you placed this issue into your corrective action program and are currently developing plans to address this issue. The NRC will continue to monitor your staff's effort and progress in addressing the theme until the theme criteria are no longer met.

The Cooper Nuclear Station had three SCCIs that were open during this assessment period. In our annual assessment letter dated March 5, 2012 (ML120650243), the NRC opened an SCCI associated the aspect of thoroughness of problem evaluation such that the resolutions address causes and extent of conditions [P.1(c)]. In our mid-cycle assessment letter dated

September 4, 2012 (ML12243A437), the NRC opened an SCCI associated with the aspect of use of conservative assumptions in decision making and adopting a requirement to demonstrate that the proposed action is safe in order to proceed rather than a requirement to demonstrate that it is unsafe in order to disapprove the action [H.1(b)]. In our annual assessment letter dated March 4, 2013 (ML13063A076), the NRC opened an SCCI associated with the aspect of complete, accurate, and up-to-date design documentation, procedures, and work packages [H.2(c)]. Your corrective actions to address the three SCCIs included; 1) assigning mentors to review key engineering analysis products, 2) revising your corrective action program for evaluating violations and SCCIs, 3) conducting operability training with the operations department, and 4) conducting training on your design and licensing basis with engineering and operations departments. In our assessment letters, the NRC stated that each SCCI would remain open until your staff demonstrated sustainable performance improvements as evidenced by effective implementation of an appropriate corrective action plan that resulted in no safety significant inspection finding and a notable reduction in the overall number of inspection findings with the same common theme.

The NRC's review of your progress with regard to these SCCIs is documented in NRC Inspection Report 05000298/2013005. The NRC identified no safety-significant inspection findings and a notable reduction in the overall number of inspection findings within each cross-cutting theme. Therefore, the NRC determined that the SCCIs are closed. The NRC will continue to review the effectiveness of your corrective actions implemented to address these SCCIs.

The enclosed inspection plan lists the inspections scheduled through June 30, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the mid-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence.

In our end-of-cycle assessment letter dated March 4, 2013 (ML13063A076), the NRC stated our intent to review the results of an independent assessment of the Safety Culture at the Cooper Nuclear Station. In your letter dated May 28, 2013 (ML13155A141), you informed the NRC that your staff had performed such an independent assessment of the site safety culture. As a result, the NRC plans to perform Inspection Procedure 40100, "Independent Safety Culture Assessment Follow up." The purpose of this inspection is to confirm that your staff is appropriately addressing any issues identified by the safety culture assessment.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised effective January 1, 2014. New cross-cutting aspects will be coded in accordance with the latest revision to NRC Inspection Manual Chapter (IMC) 0310, dated December 19, 2013. Cross-cutting aspects identified in the last six months of 2013 using the previous terminology will be converted to the revised language in accordance with the cross-reference in IMC 0310. The revised cross-cutting aspects will be evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305 starting with the calendar year 2014 mid-cycle assessment.

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

Please contact me at 817 200-1144 with any questions you have regarding this letter.

Sincerely,

Donald B. Allen

Donald B. Allen, Chief
Project Branch C
Division of Reactor Projects

Docket No. 50-298
License No. DPR-46

Enclosure: Cooper Nuclear Station Inspection/Activity Plan

cc w/enclosure: Electronic Distribution

Cooper
Inspection / Activity Plan
03/01/2014 - 06/30/2015

Unit Number	Planned Dates Start	End	Inspection Activity	Title	No. of Staff on Site
			EXAM	**- INITIAL OPERATOR EXAM**	**4**
1	06/23/2014	06/27/2014	X02529	INITIAL EXAM- COOPER (12/1/14)	
1	07/28/2014	08/02/2014	X02529	INITIAL EXAM- COOPER (12/1/14)	
			EP-2	**- EXERCISE SCENARIO REVIEW**	**2**
1	06/02/2014	07/10/2014	IP 7111408	Exercise Evaluation – Scenario Review	
			RS 24	**- RADIATION SAFETY**	**2**
1	06/16/2014	06/20/2014	IP 71124.02	Occupational ALARA Planning and Controls	
1	06/16/2014	06/20/2014	IP 71124.04	Occupational Dose Assessment	
			EP-1	**- EP PERFORMANCE INDICATORS**	**1**
1	08/04/2014	08/08/2014	IP 71151-EP01	Drill/Exercise Performance	
1	08/04/2014	08/08/2014	IP 71151-EP02	ERO Drill Participation	
1	08/04/2014	08/08/2014	IP 71151-EP03	Alert & Notification System	
			EP-3	**- BIENNIAL EXERCISE INSPECTION HAB**	**5**
1	08/04/2014	08/08/2014	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	08/04/2014	08/08/2014	IP 7111407	Exercise Evaluation - Hostile Action (HA) Event	
			71111.08	**- INSERVICE INSPECTION**	**1**
1	09/22/2014	10/03/2014	IP 60855.1	Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
			RS 13 PI	**- RADIATION SAFETY**	**2**
1	10/06/2014	10/10/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	10/06/2014	10/10/2014	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1	10/06/2014	10/10/2014	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	10/06/2014	10/10/2014	IP 71151-PR01	RETS/ODCM Radiological Effluent	
			EB1-07T	**- CNS TRIENNIAL HEAT SINK PERFORMANCE**	**1**
1	02/23/2015	02/27/2015	IP 7111107T	Heat Sink Performance	
			EB1-21T	**- CNS COMPONENT DESIGN BASIS INSPECTION**	**7**
1	04/06/2015	05/08/2015	IP 7111121	Component Design Bases Inspection	
			RS 5678	**- RADIATION SAFETY - TEAM**	**4**
1	05/11/2015	05/15/2015	IP 71124.05	Radiation Monitoring Instrumentation	
1	05/11/2015	05/15/2015	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
1	05/11/2015	05/15/2015	IP 71124.07	Radiological Environmental Monitoring Program	
1	05/11/2015	05/15/2015	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
			TSB 52B	**- BIENNIAL PI&R INSPECTION**	**4**
1	06/08/2015	06/12/2015	IP 71152B	Problem Identification and Resolution	

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

Cooper
Inspection / Activity Plan
03/01/2014 - 06/30/2015

Unit Number	Planned Dates Start	Planned Dates End	Inspection Activity	Title	No. of Staff on Site
			TSB 52B	- BIENNIAL PI&R INSPECTION	4
1	06/22/2015	06/26/2015	IP 71152B	Problem Identification and Resolution	

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