

COOPER NUCLEAR STATION P.O. BOX 98, BROWNVILLE, NEBRASKA 68321 TELEPHONE (402) 825-3811

CNSS893249 November 3, 1989

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

- Reference: 1) Letter from G. A. Trevors (NPPD) to U. S. NRC dated May 17, 1989; subject: NPPD Response to Notice of Violation - NRC Inspection Report No. 89-09
 - Letter from R. D. Martin (U.S. NRC) to G. A. Trevors (NPPD) dated June 20, 1989; subject: Systematic Assessment of Licensee Performance
 - 3) Letter from G. A. Trevors (NPPD) to K. D. Martin (U.S. NRC) dated August 11, 1989; subject: Systematic Assessment of Licensee Performance

Gentlemen:

This letter documents recent discussions with NRC Region IV regarding the District's request for a time extension for completion of a portion of the corrective action response contained in Reference 1. The District committed to complete four corrective steps in the Reference 1 letter; and three of these have been successfully accomplished. However, step four was to make certain changes to the Root Cause Analysis Program, and had a commitment completion date of October 31, 1989.

The District is undertaking a comprehensive upgrade of the Root Cause Analysis Program at Cooper Nuclear Station as a result of our 1989 SALP Report (Reference 2). A detailed, independent review of the existing program is being conducted by a leading expert in Root Cause Analysis. The recommendations of this recognized specialist are being reviewed in depth and will be incorporated, as appropriate, into the Cooper Nuclear Station program by December 31, 1989. This upgrade will be more comprehensive than, and will include the commitments (corrective action step 4) of, our Reference 1 letter.

In consideration of the benefits that will be realized by the more in-depth review and resulting upgrades to the Root Cause Analysis Program at Cooper Nuclear Station, the District requests the scheduled completion date of Item 4 in Reference 1 (October 1989) be modified to coincide with the scheduled completion date of December 1989 committed to in the District's SALP response (Reference 3).

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If you have any questions regarding this response, please contact me or G. R. Horn at the site.

Sincerely,

Be Walt for

G. A. Trevors Division Manager Nuclear Support

GAT: js/sg

cc: U.S. Nuclear Regulatory Commission Region IV Arlington, TX

> NRC Resident Inspector Cooper Nuclear Station