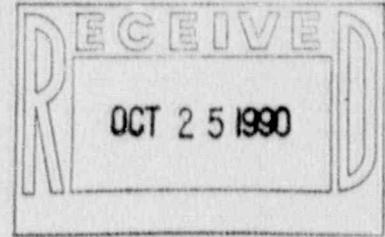


Nebraska Public Power District

GENERAL OFFICE
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CNSS902233
October 19, 1990



Mr. Robert D. Martin
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Reference: Docket 50-298/90-21 Report of the Systematic Assessment of Licensee Performance (SALP) for Cooper Nuclear Station during the period from April 16, 1989, through July 15, 1990

Dear Mr. Martin:

We respectfully request your reconsideration of the Category 2 rating awarded to the Cooper Nuclear Station (CNS) Security assessment area. While the referenced report states that this rating is "with improving trends" and that "the SALP Board noted significant improvements in the security programs, hardware, and self-assessment capabilities", we believe that the improvements and accomplishments in the Security area are very significant, and justify a Category 1 rating. Our justification is based on the following Security accomplishments:

- Completion of a \$5.7 million Comprehensive Upgrade of the Security System
- Security Personnel Training Improvements
- Security Guard Morale Enhancements (Contractor)
- Increased Management Effectiveness

The scope and significance of each of these accomplishments is detailed in the attachment to this letter. Additionally, three comprehensive inspections by Region IV Security Inspectors and continuous observation by the Resident NRC Inspectors identified a total of four Security Level IV violations during this assessment period. There were no deviations, noncited violations or weaknesses identified during these inspections. One of these violations referred to incidents of badge and vehicle control that occurred during a refueling outage that was in progress early in this rating period. Corrective actions that were implemented at that time virtually eliminated recurrence of these incidents during a subsequent refueling outage which was concluded prior to the end of this assessment period. Additionally, as a result of aggressive security program management during this period, the NRC Security Inspectors were able to close a total of 19 previously identified items, including 7 violations, 6 open items, 3 unresolved items, and 3 LERs.

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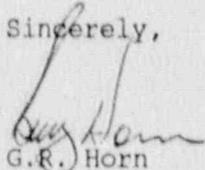
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As mentioned in the security analysis section of the SALP Report, we submitted Revision 24 to the Security Safeguards Plan under the provisions of 10CFR50.54(p). One of the changes was determined to be inconsistent with these provisions and, therefore, was considered improper. The change was subsequently withdrawn. While not a regulatory requirement, NPPD does not place into effect any submitted changes until your review concurs with our assessment that the changes do not degrade effectiveness. Because of this policy, we do not subscribe to the direction available to a licensee under 10CFR50.54(p)(2). Therefore, since the mentioned change never took effect it should not be viewed as improper but instead mentioned on a positive note.

Again, based upon the explanation provided, we believe a Category I SALP rating in the security area is justifiable. Your reconsideration of the security area SALP rating would be greatly appreciated.

With respect to the remaining functional areas discussed in the SALP report, we are in fundamental agreement with your assessment of each. The District is evaluating the licensee actions which you have recommended and is formulating plans to continue strengthening its performance in all areas. Should you have any questions or comments regarding this response, please contact me.

Sincerely,



G.R. Horn

Nuclear Power Group Manager

GRH:rdw/cml-CNSS902233
Attachment

cc: NRC Resident Inspector
Cooper Nuclear Station

CNS SECURITY IMPROVEMENTS

COMPLETION OF A \$5.7 MILLION COMPREHENSIVE UPGRADE OF THE SECURITY SYSTEM.

The District commenced a major upgrade of the CNS security system in 1986. This upgrade was completed in July 1989 at a final cost of approximately 5.7 million dollars. A new electrical duct bank was constructed around the perimeter of the protected area. All of the microwave IDS zones were redesigned to include the addition of several zones, installation of new microwave head mounting posts/brackets, new wiring and additional microwave heads. The protected area fence line was rebuilt in several areas to provide sharper contrast and reduce the barrier shadowing effect for easier assessment of the isolation zones by the security guardforce. The entire interior isolation zone and portions of the exterior isolation zone were reworked to provide increased soil stabilization and enhanced microwave coverage of the zones.

Illumination of the CNS Isolation Zones and protected area was upgraded to maintain at least 0.2 foot candles. The upgrade lighting is currently of sufficient intensity to allow the security guardforce to observe the protected area by closed circuit TV or by direct means.

An entirely new Closed Circuit Television system was designed and installed which approximately doubled the number of the exterior perimeter cameras. New cameras, wiring, camera towers/mountings and monitors were purchased and installed. A new video switcher was installed in the Central Alarm Station and was programmed to automatically call up two cameras for each IDS zone. This video switcher increased the assessment capability of the console operators in both the Central Alarm Station and Secondary Alarm Station.

The Central Alarm Station and Secondary Alarm Station consoles were replaced with new consoles that enhance the operators ability to observe, communicate and direct the necessary response. The consoles reflect state-of-the-art human factor engineering.

In the Fall of 1989, a new stride breaker fence was completed around the interior isolation zone. This fence approximates a dual perimeter fence that isolates access to the microwave IDS zones. This fence provides additional time to assess Intrusion Detection System alarms and has reduced the occurrence of nuisance alarms.

A vehicle entrapment area was also completed in the Fall of 1989. Normal vehicle and personnel traffic into the protected area and the entrapment area is now isolated while the vehicle is searched. This entrapment area provides additional perimeter security by having a gate barrier in place during all normal vehicle entries/exits of the protected area.

Aircraft cabling was installed during the Fall of 1989 on the portion of the protected area fence not protected by buildings/terrain. This cabling provides a higher degree of protection against a no-notice vehicle bomb threat.

The security system modifications and upgrades completed during the recent SALP evaluation period were extremely comprehensive in nature and resulted in significant improvement in the overall physical security of the station.

SECURITY PERSONNEL TRAINING IMPROVEMENTS

A Security training review committee was established in May, 1989, to evaluate the entire security officer training program. Twelve areas were identified for upgrade and program improvements implemented. The Security Training instructors attended an instructor training course to enhance their abilities and skills. The use of training aids was also greatly expanded. The Security Training classroom was refurnished, expanded, and upgraded. The curriculum of instruction provides more individualized instruction/evaluation with increased instructor participation in on-the-job observation and evaluation. A formalized program of Security Shift Supervisor Training was established in July, 1989 with increased emphasis on contingency events, compensatory measures and 10CFR73.71 reporting.

These security force training improvements resulted in enhanced guard performance and greater security force effectiveness.

SECURITY GUARD MORALE ENHANCEMENTS (CONTRACT FORCE).

In the Spring of 1989, new uniforms were provided to the guard force. These uniforms project a para-military image and promote both a greater sense of pride and a more professional appearance. Additionally, the security officers prefer the comfort and reduced maintenance of the new uniforms.

During the same period the Contract Security Force established "Guard of the Quarter" and "Supervisor of the Year" awards to promote excellence and recognize consistent performance. These awards provide monetary and plaque incentives, along with the resultant recognition by fellow employees and supervision.

The Contract Security Force also established recognition plaques to honor security officers who met specific standards in firearms and physical demands qualifications. The motivation created by these recognition plaques resulted in an average firearms score increase of 14 points and a significant (approximately 600%) increase in the number qualifying for the physical demands recognition.

These moral enhancement measures have resulted in substantial improvement in guardforce motivation and effectiveness.

INCREASED MANAGEMENT EFFECTIVENESS

Several important measures were taken which improved the management effectiveness in the security area during the recent SALP period.

An exchange was established between the CNS and Wolf Creek Quality Assurance Security sections to augment each other's staff during the respective annual security audits. This exchange provided an outside security specialist's review of the effectiveness of the respective plans and procedures.

Improvements in the trending and tracking of events at CNS, and the results: root cause analyses, have greatly improved the data available for more efficient and effective management overview and corrective action. The significant improvement in this area was noted by the Region IV Security Inspector in March 1990.

Actions taken to reduce the incidents of badges being taken off site include the purchase and installation of an article detector which has virtually eliminated recurrence of this type of incident. The installation of a Personal Identification Number (PIN) system on the entrance turnstiles has effectively eliminated the issuance/usage of an incorrect encoded access badge. A new badge attachment device has significantly reduced incidents of a badge accidentally being lost on site. Installation of an alarm on the ignition system of licensee designated vehicles has virtually eliminated all occurrences where the ignition key is not removed when the vehicle is left unattended. These mechanical/electronic improvements indicate a strong commitment by management to eliminate these occurrences. Additionally, if an incident occurs due to personnel error, a letter is written to the offending individual's supervisor requiring a reply with the actions taken to prevent recurrence.

Formalized checklists and procedures were established during this reporting period to evaluate the effectiveness of a security officer at a compensatory post, and to effectively determine the appropriate reporting of safeguards events.

These steps along with the aggressive overall management and overview of the security function have resulted in a strong highly effective security organization.