

SEP 19 1990

In Reply Refer To:
Docket: 50-298

Nebraska Public Power District
ATTN: George A. Trevers, Senior Staff
Advisor - Nuclear Power Group
P.O. Box 499
Columbus, NE 68602-0499

Gentlemen

This refers to the management meeting conducted at your request in the Region IV office on September 12, 1990. This meeting related to activities authorized by NRC License No. DRP-46 for the Cooper Nuclear Station (CNS). The subject of this meeting was to introduce the new CNS plant management organization and to discuss nuclear training issues, the use of technical expertise on internal surveillances, and maintenance program improvements.

The subjects discussed at this meeting are described in the enclosed Meeting Summary. This meeting was attended by those on the attached Attendance List.

It is our opinion that this meeting was beneficial and has provided a better understanding of the efforts that Nebraska Public Power District has undertaken to address identified issues and help mitigate any future concerns.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

131

Samuel J. Collins, Director
Division of Reactor Projects

Enclosure:
Meeting Summary w/attachments

cc w/enclosure: (see next page)

<i>[Signature]</i> RIV:DRP/C RV:zua;bh 9/14/90	<i>[Signature]</i> C:DRP/C GLConstable 9/14/90	<i>[Signature]</i> D:DRP SJCcollins 9/14/90
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*IE45
11*

Nebraska Public Power District

-2-

Nebraska Public Power District
ATTN: G. D. Watson, General Counsel
P.O. Box 499
Columbus, Nebraska 68602-0499

Cooper Nuclear Station
ATTN: John M. Meacham, Division
Manager, Nuclear Operations
P.O. Box 98
Brownville, Nebraska 68321

Nebraska Department of Environmental
Control
ATTN: Dennis Grams, Director
P.O. Box 98922
Lincoln, Nebraska 68509-8922

Nemaha County Board of Commissioners
ATTN: Larry Bohlen, Chairman
Nemaha County Courthouse
1824 N Street
Auburn, Nebraska 68305

Nebraska Department of Health
ATTN: Harold Borchert, Director
Division of Radiological Health
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509-5007

Kansas Radiation Control Program Director

U.S. Nuclear Regulatory Commission
ATTN: Senior Resident Inspector
P.O. Box 218
Brownville, Nebraska 68321

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

bcc to DMB (IE45)
bcc distrib. by RIV:

R. D. Martin
Section Chief (DRP/C)
DRSS-FRPS
RIV File
RSTS Operator
P. O'Connor, NRR Project Manager (MS: 11-D-23)
DRS

Resident Inspector
Lisa Shea, RM/ALF
MIS System
Project Engineer (DRP/C)
DRP

MANAGEMENT MEETING SUMMARY

Licensee: Nebraska Public Power District (NPPD)

Facility: Cooper Nuclear Station (CNS)

License No.: DRP-46

Docket No.: 50-298

Subject: MANAGEMENT MEETING TO INTRODUCE THE NEW CNS PLANT MANAGEMENT ORGANIZATION AND TO DISCUSS THE STATUS OF OTHER AREAS OF INTEREST

On September 12, 1990, representatives of NPPD met with Region IV personnel in Arlington, Texas, to introduce the new CNS plant management organization that resulted from a management reorganization which took place on June 6, 1990. In addition, the licensee provided a briefing on three other areas of interest: the results of NPPD's assessment regarding the use of technical expertise on internal quality assurance surveillances; the status of nuclear training issues; and maintenance program improvements.

The licensee's presentation addressed the programs that are presently in effect at CNS, and the future (planned) programs that are designed to address identified issues and help mitigate any future concern.

A copy of the licensee's presentation material is attached.

Attachments:

1. Attendance list
2. Licensee Presentation Material: (NRC distribution only)
 - NPPD Organization Chart
 - Technical Expertise on Internal Surveillance
 - Maintenance Program Improvements
 - Nuclear Training Issues

ATTENDANCE LIST

Attendance at the management meeting between NPPD and NRC on September 12, 1990, in the Region IV office:

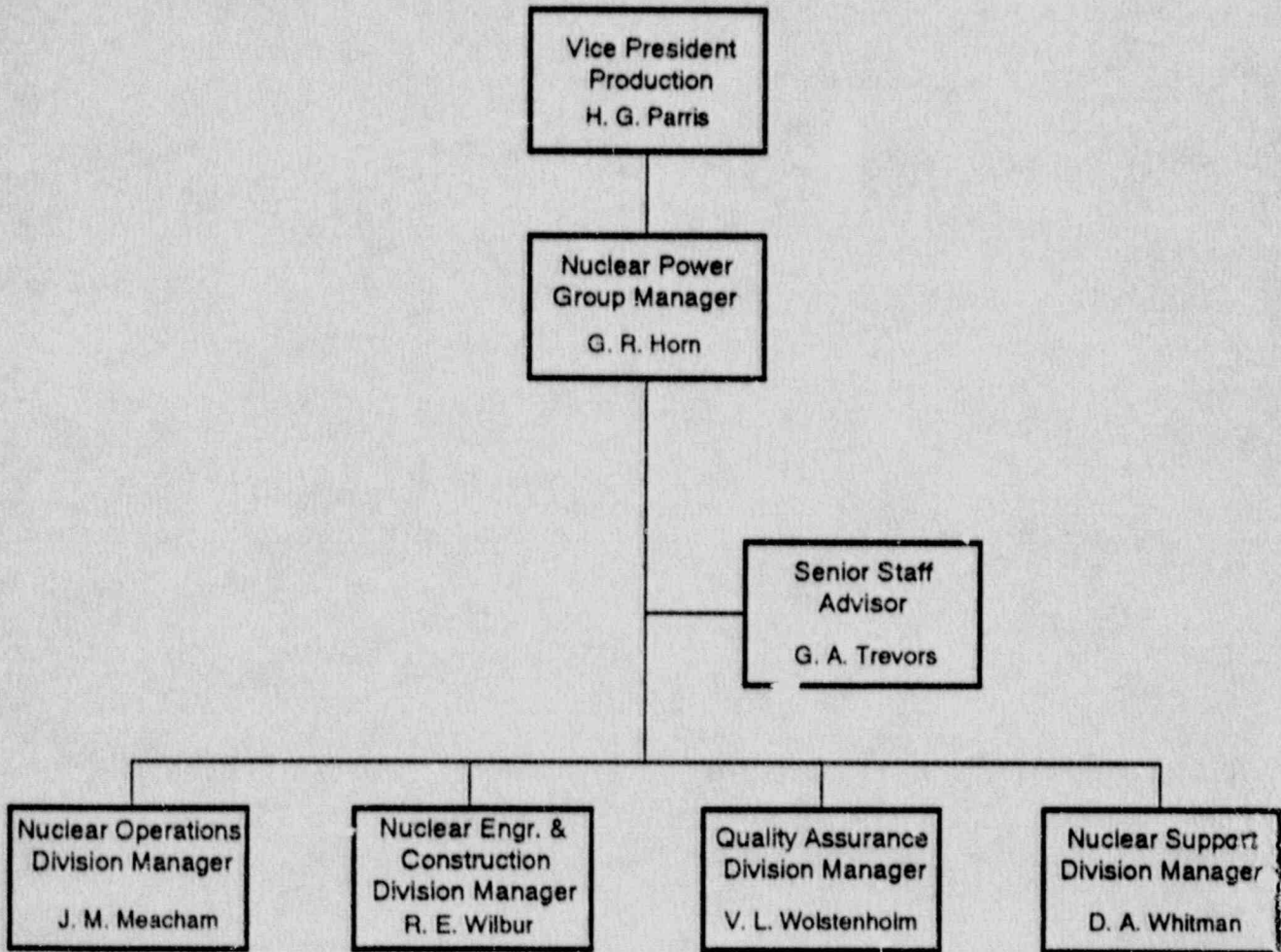
NPPD

H. Parris, Vice President - Production
G. Horn, Nuclear Power Group Manager
J. Meacham, Division Manager, Nuclear Operations
D. Whitman, Division Manager, Nuclear Support
V. Wolstenholm, Division Manager, Quality Assurance
R. Gardner, Senior Manager of Operations

NRC

R. Martin, Regional Administrator
J. Johnson, Acting Director, Division of Reactor Projects (DRP)
P. Gwynn, Deputy Director, DRP
J. Jaudon, Deputy Director, Division of Reactor Safety (DRS)
L. Constable, Chief, Project Section C, DRP
J. Pellet, Chief, Operator Licensing Section, DRS
R. Bennett, Senior Resident Inspector, DRP
R. Azua, Project Engineer, DRP
P. O'Connor, Project Manager, Office of Nuclear Reactor Regulation

Organization Chart
General Office
Production
Nuclear Power Group



NEBRASKA PUBLIC POWER DISTRICT

Organization Chart

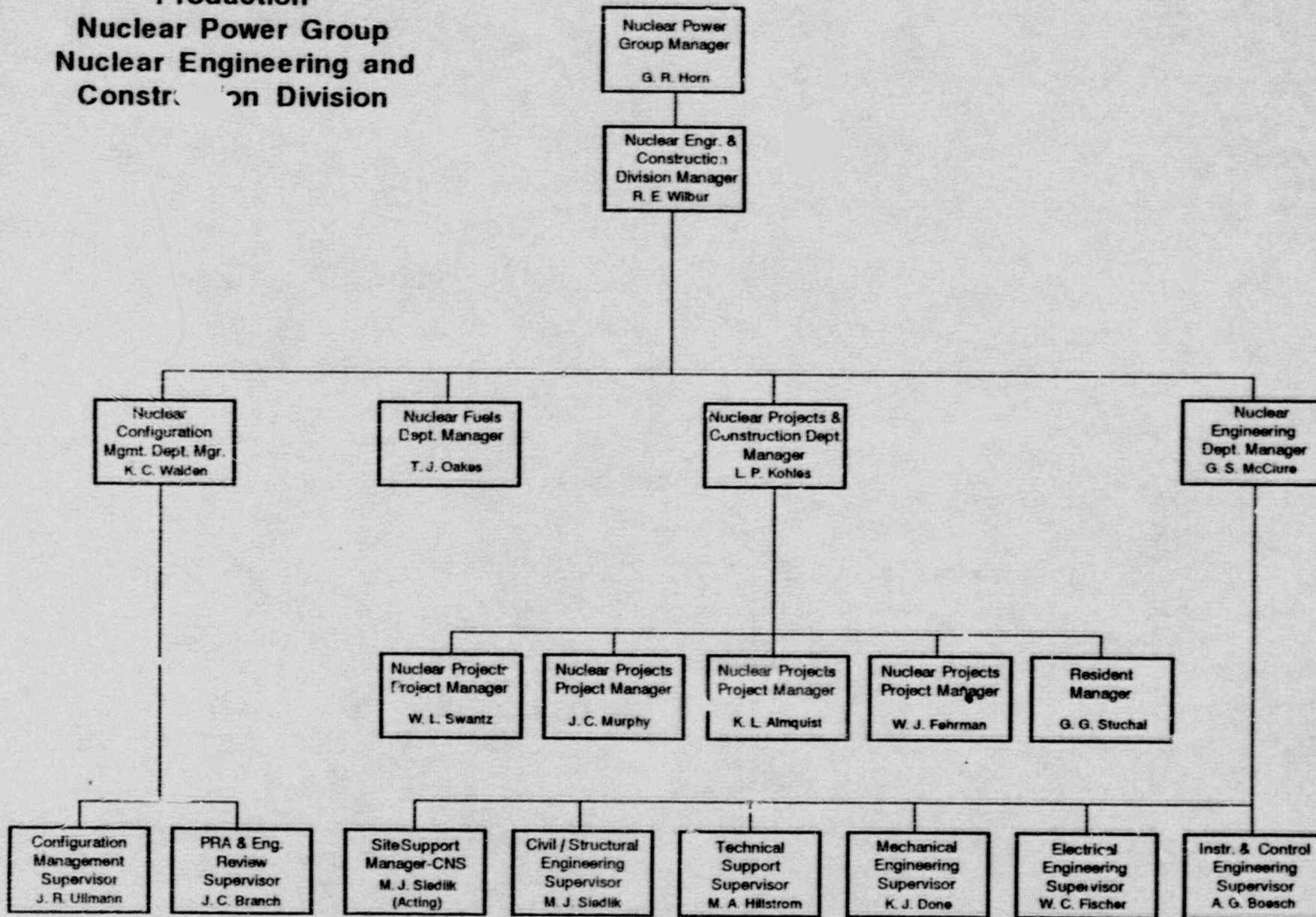
General Office

Production

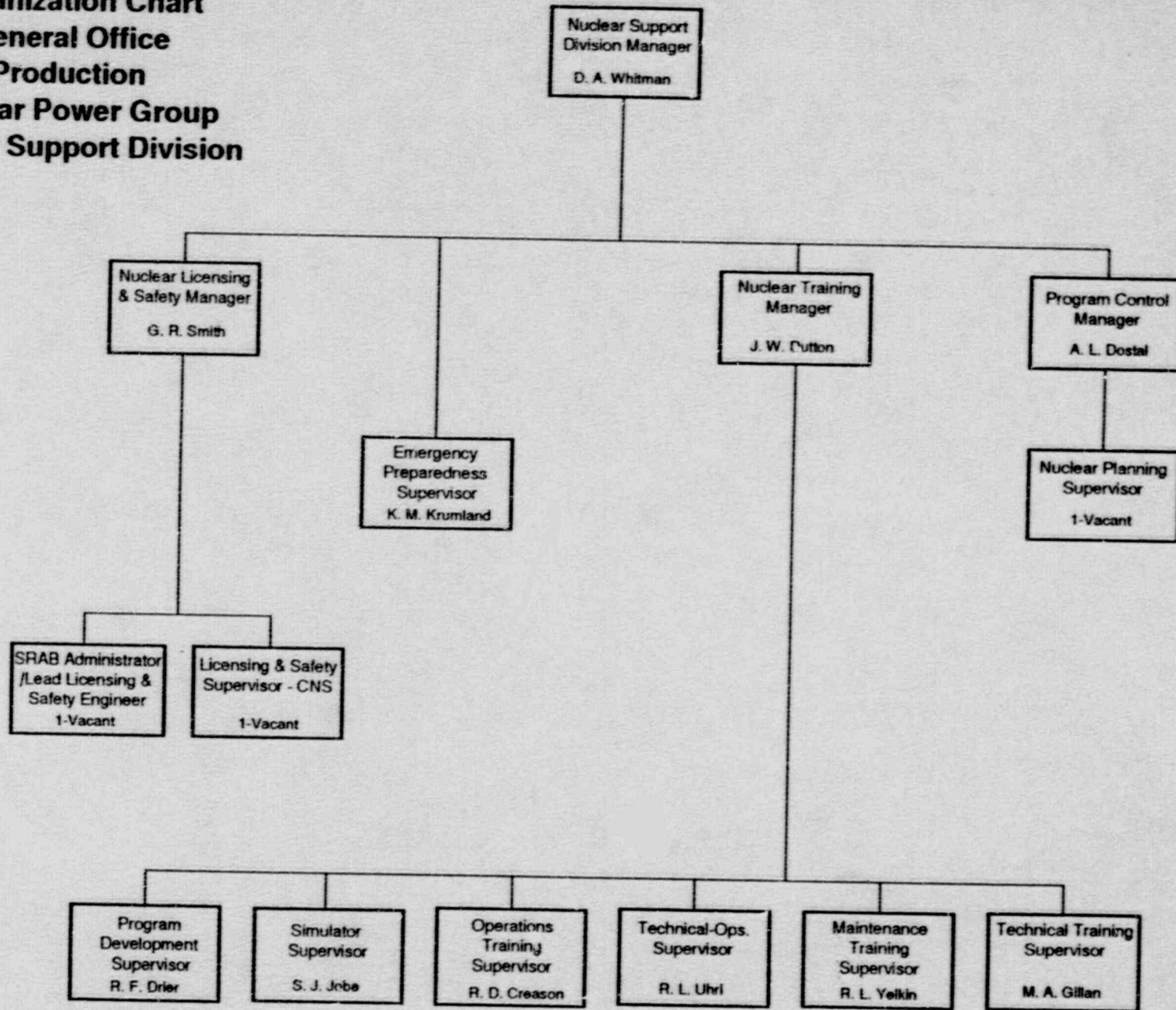
Nuclear Power Group

Nuclear Engineering and

Construction Division

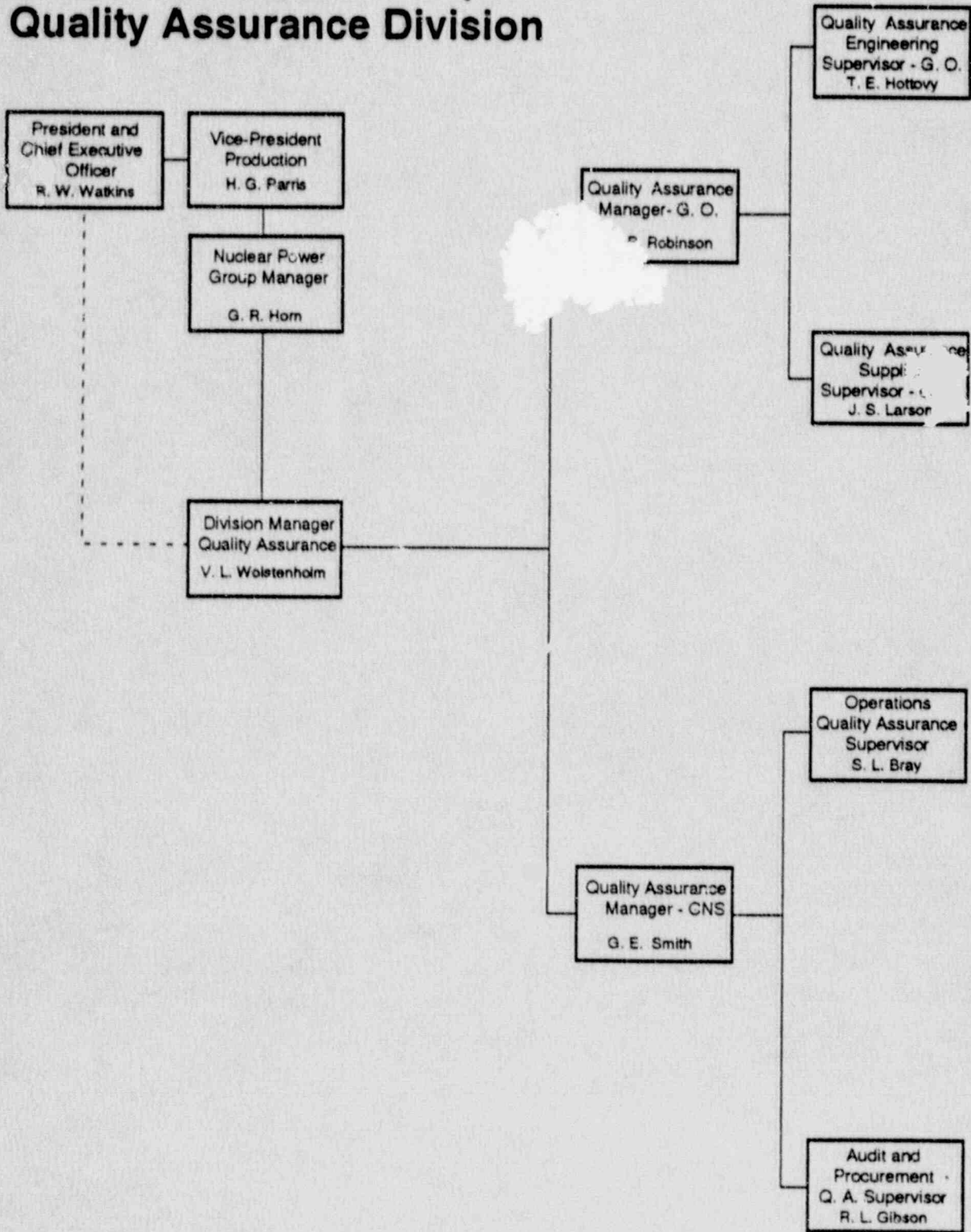


NEBRASKA PUBLIC POWER DISTRICT
Organization Chart
General Office
Production
Nuclear Power Group
Nuclear Support Division

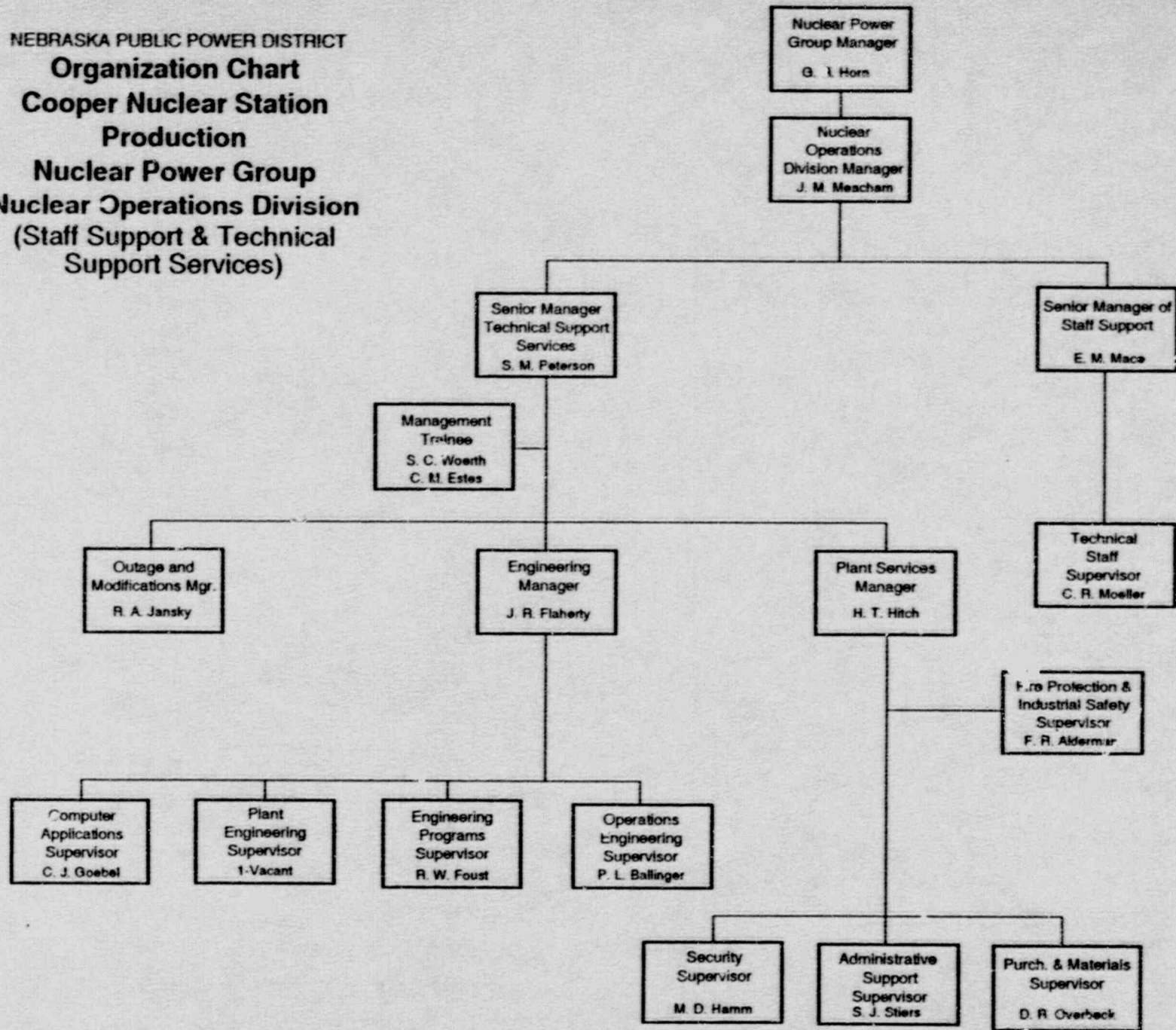


NEBRASKA PUBLIC POWER DISTRICT

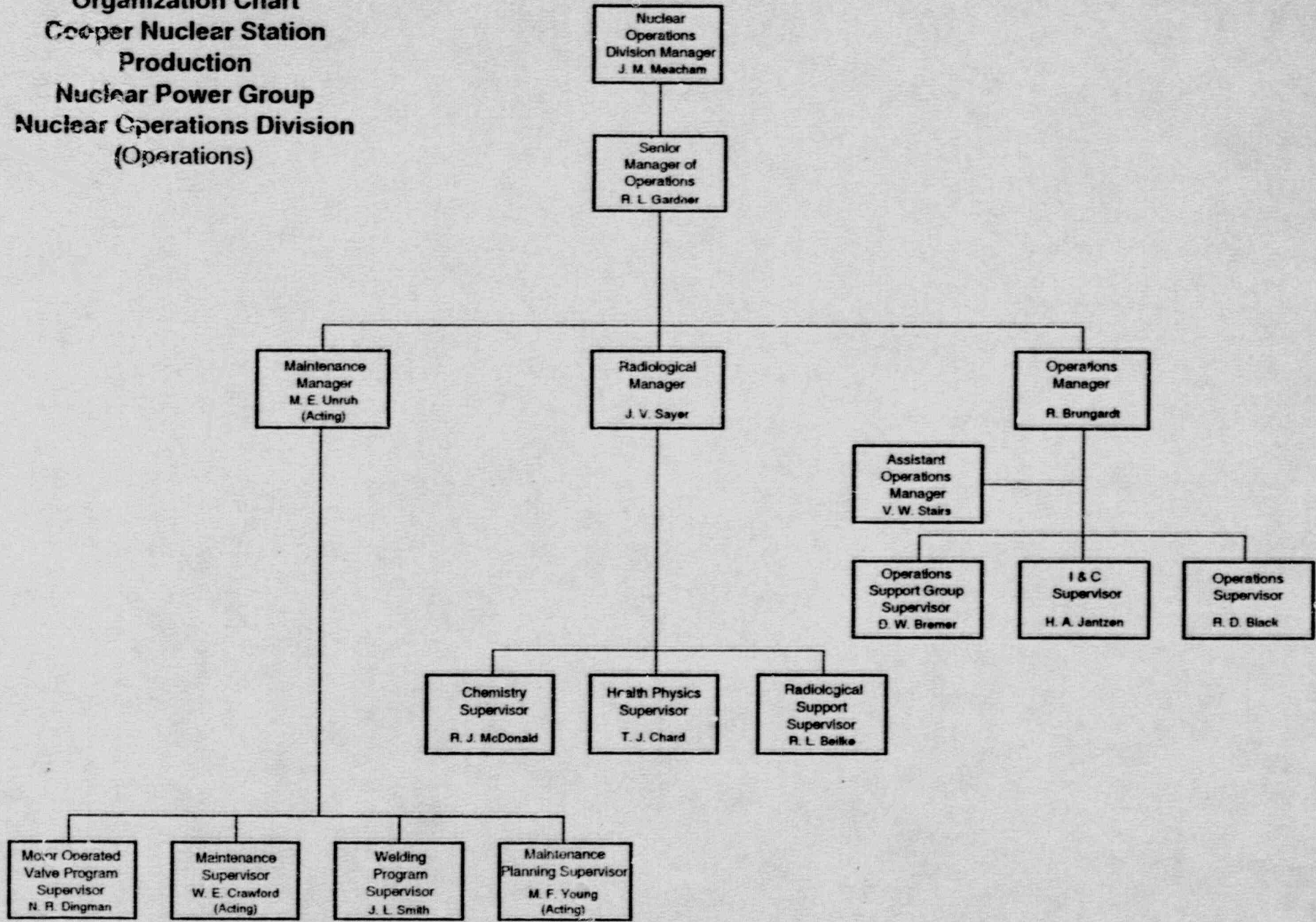
Organization Chart
General Office
Production
Nuclear Power Group
Quality Assurance Division



NEBRASKA PUBLIC POWER DISTRICT
Organization Chart
Cooper Nuclear Station
Production
Nuclear Power Group
Nuclear Operations Division
 (Staff Support & Technical Support Services)



NEBRASKA PUBLIC POWER DISTRICT
Organization Chart
Cooper Nuclear Station
Production
Nuclear Power Group
Nuclear Operations Division
(Operations)



Nebraska Public Power District

Region IV - Nuclear Regulatory Commission

Management Meeting

Technical Expertise on Internal Surveillances

An Upgrade

September 12, 1990



TECHNICAL EXPERTISE ON INTERNAL SURVEILLANCES

HISTORY

- *Through the Mid 1980's, Audits and Surveillances Were Primarily Compliance Based*
- *The Individuals Previous Training and Experience Was Relied Upon*
 - *Plant Experience*
 - *Nuclear Navy Experience*
- *External Training Provided in Quality Assurance*



HISTORY

- *June, 1987, Formally Established Internal Controls for Minimum Qualification of Individuals Performing Audits and Surveillances*
 - *Issued Quality Assurance Training Program Manual*

NOTE: Audits and Surveillances Were Still Primarily Compliance Based



TRAINING FOR SURVEILLANCES

- *Required Surveillance Training (INPO)*

- *Established OJT Requirements*
 - *OJT Provided by a QA Staff Member Who Had Training and/or Experience in the Functional Area*



HISTORY

- *September, 1987, the NRC Started Training on "Performance Based Inspections"*
- *In 1988 All Individuals on the QA Staff Attended "Performance Based QA Auditing" Training (External)*
- *1989 SALP Report Identified the Lack of "Technical Expertise" on Internal Audit Teams*
- *1989 Initiated Formation of the Region IV QA Managers Group*
 - *Exchange of Technical Assistance for Internal Audits*

NOTE: Presentation Made to NRC Region IV in February, 1990, Specific to Upgrading Audit Team Expertise.



NRC OBSERVATION

- *In Mid 1990 An NRC Inspection Made An Observation Concerning the Limited Training and Experience That An Individual Had in the Area He Was Performing Surveillances*
- *Although An Observation is Identified for Licensee Consideration as a Programmatic Improvement Item, and Has No Specific Regulatory Requirement, We Felt That This Issue Needed to be Evaluated Further*



ASSESSMENT OF THE OBSERVATION

- *Role of Surveillances in the QA Program*
 - *Provide Management with a Periodic Assessment*
 - *Supports the Internal Audit Program*

- *Present Training and Experience of Individuals Performing Surveillance*



CONCLUSION OF THE ASSESSMENT

- *Although There is an Established Program for Qualifying Individuals to Perform Surveillances, an Upgrade to That Program Was Desirable*
 - *An Upgrade to the Program Would Strengthen All Portions of the Quality Assurance Program*



ACTIONS TAKEN

- *Established the Following Objective*
 - *Upgrade the QA Training Program for QA Personnel, to Strengthen Their Expertise in the Various Functional Areas, for Performing "Performance Based" Audits and Surveillances*

- *The CNS QA Manager Has Been Tasked With Identifying Alternatives for Meeting the Objective*
 - *Present Alternatives to Management by October 1, 1990*

- *Establish a Project Plan for Meeting the Objective - December 1, 1990*



MAINTENANCE PROGRAM IMPROVEMENTS

JOHN M. MEACHAM

DIVISION MANAGER OF NUCLEAR OPERATIONS

SEPTEMBER 12, 1990



Nebraska Public Power District

CHRONOLOGY OF EVENTS RELATED TO MAINTENANCE PROGRAM IMPROVEMENTS

- 1986 - Management Recognition of Industry Trends
- 1987 - CNS Maintenance Self Assessment
- 1989 - Systematic Assessment of Licensee Performance Report
- 1989 - Maintenance Team Inspection (MTI)
- 1990 - MTI Followup Inspection



RESULT OF MANAGEMENT RECOGNITION OF INDUSTRY TRENDS IN 1986

- Upgraded Maintenance Procedures
- Staffing Levels Increased
- Maintenance Training Program Accredited
- Initiated Maintenance Self-Assessment



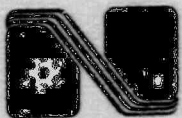
RESULTS OF THE 1987 MAINTENANCE SELF ASSESSMENT

- Root Cause Determinations Not Effective.
 - Enhanced Failure Coding.
 - Modified Equipment History Data File.

- Post Maintenance Testing Needed Enhancement.
 - Developed New Post Maintenance Testing Procedure.
 - Reviewed and Upgraded Existing Maintenance Procedures.

- Engineering Support Considered Weak.
 - Established a Maintenance Technical Engineering Group.
 - Initiated Enhancements to System Engineering Program.

- Maintenance Scheduling Inadequate.
 - Established a Supervisory Level Overview Committee.
 - Added Two Maintenance Planner/Scheduler Positions.



RESULTS OF THE 1989 SALP REPORT

- Develop Effective Predictive Maintenance Program.
 - Improvements Made in Condition Based Monitoring Techniques.
 - Continued Implementing Performance Monitoring Program
 - Continued Integrating Predictive Maintenance Program.

- Develop More Specific Maintenance Procedures and Rely Less On "Skill-of-the-Craft".
 - Established Procedure Review Group.
 - Developing Maintenance Guideline Documents.
 - Enhancing Existing Maintenance Procedures.
 - Identifying New Procedures for Development.

- Incorporate Lessons Learned Into Maintenance Procedures.
 - Maintenance Department Policy Instruction Issued.



RESULTS OF THE MAINTENANCE TEAM INSPECTION

- Clearance Orders Not Always Set.
 - Revised Clearance Order Procedure.
 - Upgraded Corrective Maintenance Procedure.

- Appropriate Post Maintenance Testing Not Always Performed.
 - Revised and Enhanced Post Maintenance Testing Procedure.

- Scope of Authorized Work Occasionally Exceeded.
 - Revised Corrective Maintenance Procedure.

- Technical and Quality Inspection Requirements Not Always Included.
 - Maintenance Guidelines Being Developed.
 - Corrective Maintenance Procedure Segregated Into Functional Areas.

- Some MWRs Lacked Required Information.
 - Additional Emphasis Placed on Accuracy and Completeness.
 - An Overview Group Established to Provide for Monthly Review.



RESULTS OF THE MTI FOLLOWUP INSPECTION

- The Inspector Observed the Licensee to be Taking Positive and Aggressive Corrective Measures to Improve the Maintenance Program.

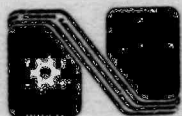
- The Inspector Concluded that, Whereas, the Adequacy of the Revised Maintenance Programs Implementation could not be Ascertained, the Direction, Scope, and Emphasis by the Licensee Appeared to be Good.

SUBSEQUENT TO THIS INSPECTION, THE COMMITTED PROCEDURE REVISIONS HAVE BEEN IMPLEMENTED AS SCHEDULED. THE EFFECTIVENESS OF THESE CORRECTIVE MEASURES WILL BE CLOSELY MONITORED.



CHRONOLOGY OF EVENTS AND TYPES OF PROBLEMS FOUND

<u>EVENTS</u>	<u>PROBLEM TYPES</u>
<input type="checkbox"/> 1986 - Management Recognition of Industry Trends	Programmatic
<input type="checkbox"/> 1987 - CNS Maintenance Self Assessment	Programmatic
<input type="checkbox"/> 1989 - Systematic Assessment of Licensee Performance Report	Programmatic and Implementation
<input type="checkbox"/> 1989 - Maintenance Team Inspection (MTI)	Implementation (Specific Issues)
<input type="checkbox"/> 1990 - MTI Followup Inspection	None Noted - Based on Meeting In- Process Commitments



ADDITIONAL MAINTENANCE PROGRAM IMPROVEMENTS

- Added Senior Manager Position.
- Established Back-Shift Management Support During Refueling Outages.
- Actively Participating in Region IV Maintenance Manager's Association.
- Extensive Involvement in Owner's Group Activities.
- Added Welding Program Supervisor and MOV Program Supervisor.



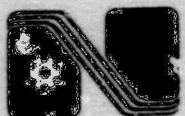
CONTINUING/PLANNED MAINTENANCE PROGRAM IMPROVEMENTS

- Improve Training
- Improve Maintenance Procedures
- Increase Involvement in Related Industry Group Activities
- Establish a Maintenance Performance Assessment Program



CONCLUSION

OUR OBJECTIVE IS TO HAVE ONE OF THE BEST MAINTENANCE PROGRAMS IN THE INDUSTRY.



Nebraska Public Power District

NEBRASKA PUBLIC POWER DISTRICT

REGION IV - NUCLEAR REGULATORY COMMISSION

MANAGEMENT MEETING

Nuclear Training Issues

An Update

September 12, 1990



INTRODUCTION

February 28 Management Meeting

June 14 Update

Update on Progress to Date



TRAINING PROGRAM UPGRADE

- Maintenance Training Facility*
- Simulator*
- Requal Training Program*
- Records System*
- Improved Communications Between Training and CNS Staffs*
- Organizational Changes and Staffing Enhancements*
- Additional Activities*



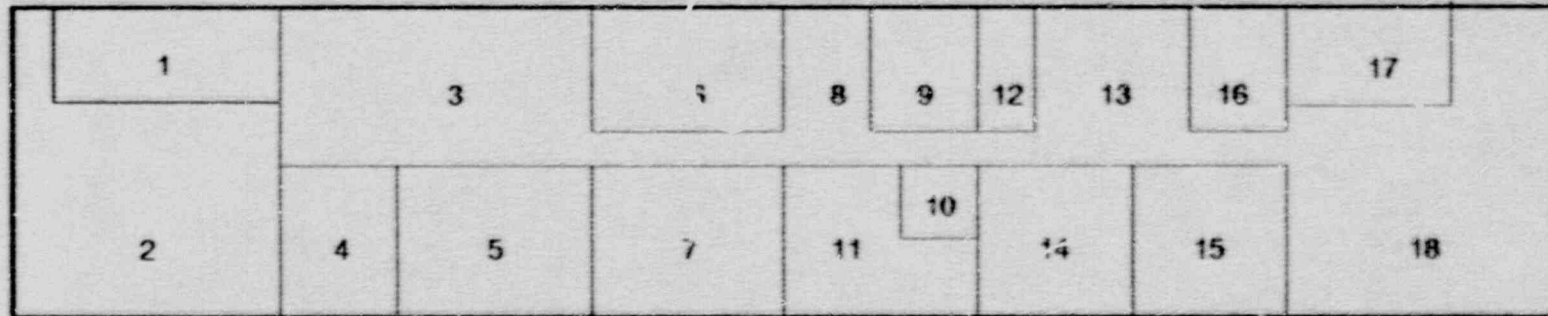
Maintenance Training Facility

Ready for Training

Planned: September 1, 1990

Actual: August 17, 1990

8000 square feet



1 - Tools/Lab Equipment

2 - Storage Area

3 - Mechanical Lab

4 - Classroom/Lab

5 - Electrical Lab

6 - Classroom/Lab

7 - Classroom/Lab

8 - Personnel Cleanup Area

9 - Men's Restroom

10 - Maintenance Training Supervisor

11 - Electrical Maintenance Training Office

12 - Women's Restroom

13 - Lunch Room

14 - Mechanical Maintenance Training Office

15 - I&C Maintenance Training Office

16 - Conference Room

17 - I&C Storage

18 - I&C Lab



SIMULATOR

- *Utility Simulator Users Group Assistance Visit - September, 1990*
- *First Draft of Certification Data Report Under Review; Planned Submittal to NRC - November, 1990*
- *Simulator Scenario Development In-Progress; On Schedule*
 - *Completion by September 17, 1990*
 - *Deliverables:*
 - 35 Static Exams*
 - 25 Operating Event Scenarios*
 - 50 Requal Scenarios*
 - 80 Hot License Integrated Plant Scenarios*
 - 42 Hot License Individual Systems Lessons*



REQUALIFICATION TRAINING PROGRAM UPGRADE

- *Operations Job/Task Analysis*
 - *Task Analysis Rescheduled for December Completion*

- *Licensed Operator Exam Bank Upgrade*
 - *598 Part B Questions, 120 JPM's Have Been Developed*

 - *500 Systems Questions Based on 167 Objectives - Target Approximately 1400 Questions on 472 Objectives by February, 1991*

 - *Continue Upgrade Based on Operator Feedback, Industry Events and Plant Changes*



RECORDS SYSTEM UPGRADE

- All Required Historical and Current Training Records Loaded and System is in Use*
- TTS Training Completed for CNS and General Office Staff*



IMPROVED COMMUNICATIONS BETWEEN PLANT AND TRAINING

- Monthly Training Coordination Meetings*
- Quarterly Training Effectiveness Review Committee Meetings*
- Management Training Effectiveness Review Meetings*



ORGANIZATIONAL CHANGES

- *Technical-Operations Group Responsible for Non-Licensed Operator; STA, and Technical Staff Training Established*

- *Rotation Plan for Four CNS SRO Operators to Transfer to Training for 2 Year Assignments Agreed Upon; 2 CNS SROs Transferred*

- *SRO Certification Bonus Approved*
 - *Enhanced Recruiting*

 - *Better Instructor Utilization*

 - *Improved Morale*



TRAINING DEPARTMENT
SRO/RO INSTRUCTOR STAFFING

- *Licensed Operator Instructor Staff Increases*
 - *SRO/RO Instructor Authorizations Increased by 4, from 10 to 14*

- *Current Staffing Level*
 - *6 Nuclear Training*
 - *2 Nuclear Operations*
 - *2 Vacant (To Be Provided By Nuclear Operations Later)*
 - *4 Contractors*



ADDITIONAL TRAINING ENHANCEMENT ACTIVITIES

- *Technical Staff Training Program Evaluation*
 - *Point Beach*
 - *Hatch*
 - *McGuire*
- *STA Training Program Evaluation*
 - *Point Beach*
 - *Kewaunee*
 - *Hatch*
- *Participation in INPO Reaccreditation Visits*
 - *Chemistry (Farley)*
 - *Health Physics (Farley)*
 - *Technical Staff (McGuire)*



ADDITIONAL ACTIVITIES

- Revised NPG Training Directive Approved - Integrates Nuclear Training, Corporate Training and CNS Activities*
- Visit to Comanche Peak Maintenance Training Laboratory*
- Participation in Numerous Vendor Training Sessions to Meet Specific Plant Needs*

