



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

MAR 25 1994

Docket: 50-298
License: DPR-46

Nebraska Public Power District
ATTN: Guy R. Horn, Vice President - Nuclear
P.O. Box 98
Brownville, Nebraska 68321

SUBJECT: PUBLIC MEETING WITH NEBRASKA PUBLIC POWER DISTRICT (NPPD)

This refers to the management meeting, open to public observation, conducted on March 2, 1994, at the Region IV office in Arlington, Texas, concerning activities authorized by NRC License DPR-46 for the Cooper Nuclear Station (CNS). Attendees at the meeting are listed in Attachment 1.

The purpose of this meeting was for you to present to the NRC the status of your plans to upgrade the programmatic structure of the site's corrective action processes. Also at this meeting, you presented to the NRC the results of an internal fire protection assessment.

Regarding the corrective action program, you presented the reasons for the program upgrades, the completion dates and planned completion dates for specific actions, and the overall goals of your upgrade effort. You also made copies of the planned program procedures available to the NRC. During the discussion, you indicated some of the challenges that you faced in communicating corrective action objectives to all CNS personnel and in assuring effective corrective action at CNS. A summary of the information is provided in Attachment 2.

Regarding the fire protection internal assessment, you discussed the reasons that you performed the internal assessment and the results. A summary of the information is provided in Attachment 3.

It is our opinion that this meeting was beneficial and has provided our staff with a better understanding of your progress in implementing upgrades to your corrective action program and the efforts you have applied to assess and improve your fire protection program.

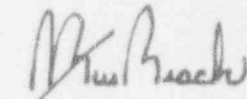
In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC's Public Document Room.

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

Sincerely,



A. Bill Beach, Director
Division of Reactor Projects

Attachments:

1. Attendance List
2. Corrective Action Program Upgrade Status
3. Fire Protection Program Internal assessment Report

cc w/attachments:

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

Nebraska Public Power District
ATTN: Mr. David A. Whitman
P.O. Box 499
Columbus, Nebraska 68602-0499

Nebraska Department of Environmental
Quality
ATTN: Randolph Wood, Director
P.O. Box 98922
Lincoln, Nebraska 68509-8922

Nemaha County Board of Commissioners
ATTN: Larry Bohlken, 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

Nebraska Public Power District

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Department of Natural Resources
ATTN: Ronald A. Kucera, Department Director
of Intergovernmental Cooperation
P.O. Box 176
Jefferson City, Missouri 65102

Kansas Radiation Control Program Director

bcc to DMB (IE45)

bcc distrib. by RIV:

L. J. Callan	Resident Inspector
Branch Chief (DRP/C)	Lisa Shea, RM/ALF, MS: MNBB 4503
MIS System	DRSS-FIPB
Branch Chief (DRP/TSS)	Project Engineer (DRP/C)
RIV File	Senior Resident Inspector - River Bend
Senior Resident Inspector - Fort Calhoun	

RIV:C:DRP/C	D:DRS <i>DF</i>	D:DRP <i>DF</i>		
JEGagliardo;df	TPGwynn	ABBeach		
3/24/94	3/24/94	3/25/94		

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RIV:C:DRP/C	D:DRS <i>DM</i>	D:DRP <i>h</i>		
JEGaglardo;df	TPGwynn	ABBeach		
3/24/94	3/24/94	3/25/94		

ATTENDANCE LIST

Nebraska Public Power District

G. Horn, Vice President, Nuclear
R. Gardner, Plant Manager
J. Lynch, Engineering Manager
R. Foust, Assistant Engineering Manager
M. Metzger, Lead Performance Engineer
G. Eckert, Consultant
T. Gray, Consultant

NRC

J. Callan, Regional Administrator
A. Beach, Director, Division of Reactor Projects (DRP)
T. Gwynn, Director, Division of Reactor Safety (DRS)
J. Mitchell, Acting Deputy Director, DRS
J. Gagliardo, Chief, Project Branch C, DRP
J. Pellet, Chief, Operations Branch, DRS
G. Constable, Chief, Plant Support Branch, DRS
R. Kopriva, Senior Resident Inspector, Cooper Nuclear Station, DRP
E. Collins, Team Leader, DRS

***CORRECTIVE ACTION PROGRAM
UPGRADE STATUS***

MARCH 2, 1994

***JOHN M. MEACHAM
SENIOR NUCLEAR DIVISION MANAGER
OF SAFETY ASSESSMENT***



CORRECTIVE ACTION PROGRAM UPGRADE

PROGRAM BEING UPGRADED IN RESPONSE TO:

- *STRATEGIC PLAN FOR PERFORMANCE IMPROVEMENT (SPPI)*
 - *PERFORMANCE ASSESSMENT PROJECT REPORT*
 - *CAPSAG REPORT*
 - *EIIT REPORT*
 - *SALP*
- *COMMON CAUSE ANALYSIS (CCA)*
- *OSTI*
- *INTEGRATED ENHANCEMENT PROGRAM*



CORRECTIVE ACTION PROGRAM UPGRADE

APPROACH / MILESTONES

<i><u>ACTION</u></i>	<i><u>PLAN DATE</u></i>	<i><u>ACTUAL DATE</u></i>
<i>ESTABLISH STEERING COMMITTEE</i>	<i>9/93</i>	<i>9/24/93</i>
<i>DEVELOP PROJECT GOALS</i>	<i>10/93</i>	<i>9/30/93</i>
<i>APPROVE CONCEPTUAL DESIGN</i>	<i>10/93</i>	<i>10/11/93</i>
<i>CONDUCT PLANT VISITS</i>	<i>10/93</i>	<i>10/29/93</i>
<i>CONDUCT MGR/SUPV WORKSHOPS</i>	<i>12/93</i>	<i>12/01/93</i>
<i>SORC REVIEW OF DRAFT CAP PROCEDURES</i>	<i>12/93</i>	<i>12/23/93</i>
<i>IMPLEMENT INTERIM CHANGES</i>	<i>1/94</i>	<i>1/27/94</i>
<i>CAP PROCEDURES PRELIMINARY APPROVAL</i>	<i>2/94</i>	
<i>PROVIDE CAP TRAINING</i>	<i>3/94</i>	
<i>PROVIDE RC TRAINING</i>	<i>3/94</i>	
<i>IMPLEMENT PROGRAM</i>	<i>3/94</i>	
<i>ASSESS PROGRAM EFFECTIVENESS</i>	<i>10/94</i>	



CORRECTIVE ACTION PROGRAM UPGRADE

UPGRADE GOALS:

- *INTEGRATED PROGRAM DESIGN*
- *PROVIDES FOR TIMELY OPERATIONS REVIEW*
- *ALLOWS DAY-TO-DAY MANAGEMENT INVOLVEMENT*
- *MATCHES RESOURCES AND SIGNIFICANCE*
- *REESTABLISHES EMPOWERMENT, OWNERSHIP, AND ACCOUNTABILITY*
- *PRODUCES RESULTS (I.E., IMPROVED ROOT CAUSE EVALUATIONS AND EFFECTIVE CORRECTIVE ACTIONS)*
- *PROMOTES TEAMWORK*
- *EXPANDS TRENDING CAPABILITY*
- *ELIMINATES EXCESSIVE OVERVIEW*
- *INCREASES FEEDBACK TO ORIGINATOR*



CORRECTIVE ACTION PROGRAM UPGRADE

PROGRAM PROCEDURES:

0.5 CONDITION REPORTING

0.5.1 DISPOSITION AND CLOSURE OF CATEGORY 1 CONDITION REPORTS

0.5.2 DISPOSITION AND CLOSURE OF CATEGORY 2 CONDITION REPORTS

0.5.3 DISPOSITION AND CLOSURE OF CATEGORY 3 CONDITION REPORTS

0.5.4 DISPOSITION OF CATEGORY 4 AND 5 CONDITION REPORTS

***0.5.5 CONDITION REPORTING PROGRAM ADMINISTRATIVE
REQUIREMENTS***

0.5.6 ROOT CAUSE EVALUATION

0.5.7 CONDITION REPORT TRENDING DATABASE

0.5.8 LICENSEE EVENT REPORTING

0.5.9 REPORTING OF DEFECTS AND NONCOMPLIANCES



CORRECTIVE ACTION PROGRAM UPGRADE

INTERIM CHANGES

<i>Change</i>	<i>Recommendation Addressed</i>	
<i>Condition Review Group</i>	<i>EIIT-6</i>	<i>Increase management attention and involvement in the CAP.</i>
	<i>SALP ETS-2</i>	<i>Increase management oversight.</i>
<i>Responsible Manager</i>	<i>EIIT-5</i>	<i>Reestablish empowerment, ownership, and accountability.</i>
	<i>SALP ETS-1</i>	<i>Resolve plant problems by correcting the root cause, with the objective of closing the issue with finality.</i>
	<i>SALP ETS-2</i>	<i>Give system engineering functions more emphasis, with more responsibility and authority for reviewing all aspects of a problem.</i>



CORRECTIVE ACTION PROGRAM UPGRADE INTERIM CHANGES

<i>Change</i>	<i>Recommendation Addressed</i>	
<i>Eliminate Tech Staff and NOC overview</i>	<i>CAPSAG R-8</i>	<i>Valid root causes, once identified, should not be altered.</i>
	<i>CAPSAG R-10</i>	<i>Overview group responsibility should not dilute root cause originators' responsibilities.</i> <i>Evaluate the value added by overview groups relative to CAP.</i>
<i>Corrective Action Plan</i>	<i>EIIT-4</i>	<i>Emphasize and implement team building.</i>
	<i>CAPSAG R-8</i>	<i>Corrective actions are negotiable and should include a value impact.</i> <i>Overview groups should not resolve interdepartmental complications, but forward such issues to line management for resolution.</i>



CORRECTIVE ACTION PROGRAM UPGRADE INTERIM CHANGES

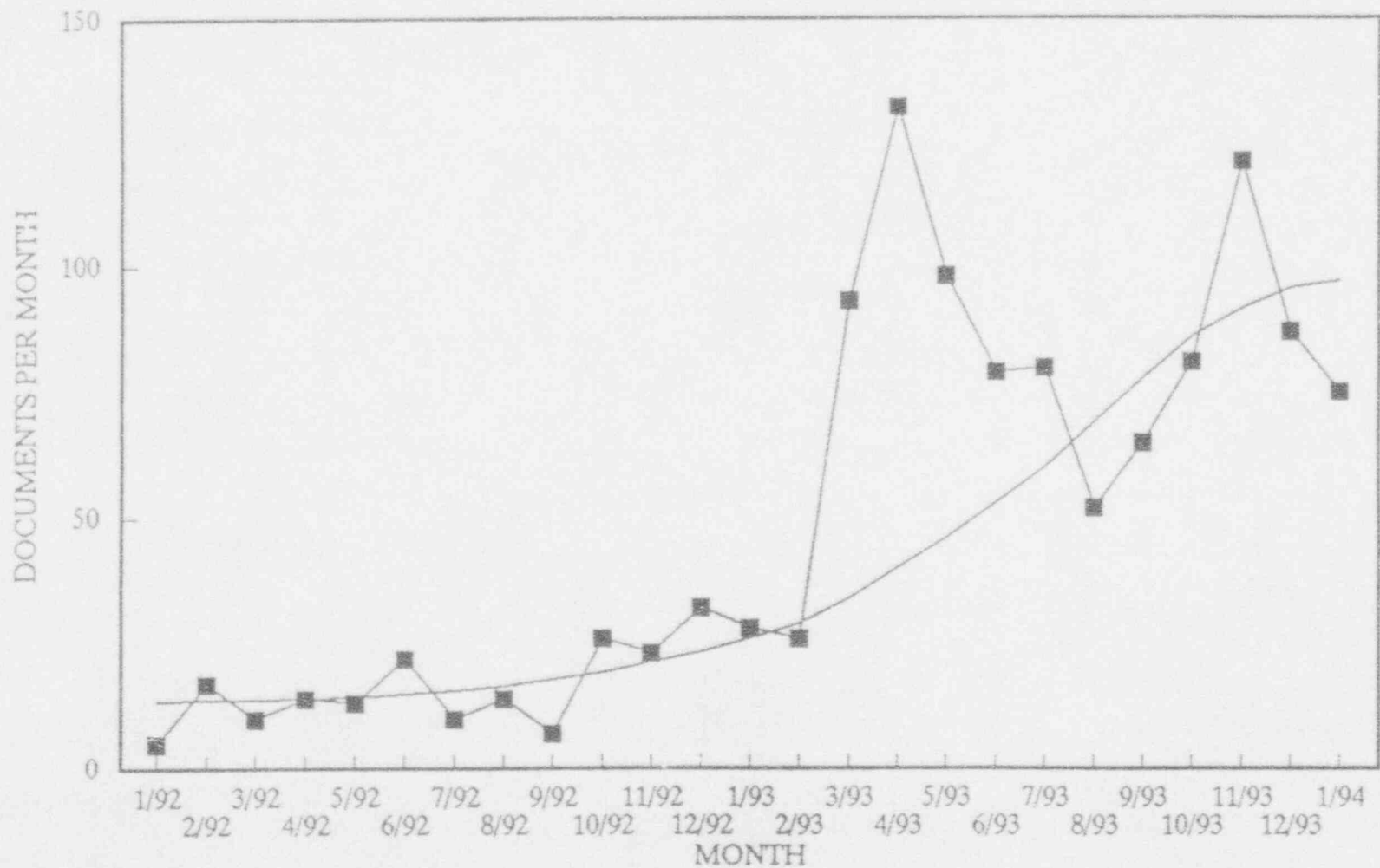
<i>Change</i>	<i>Recommendation Addressed</i>	
<i>Eliminate in-line QA NCR review</i>	<i>CAPSAG R-16</i>	<i>Utilize QA in a greater assessment role to monitor CAP effectiveness.</i>
<i>Radiological deficiency reporting</i>	<i>SALP R-1</i>	<i>Implement measures to assure that the facility staff is more aggressive in the pursuit of issues which are to be documented in the radiological safety incident report process established by site procedures.</i>



CORRECTIVE ACTION PROGRAM STATISTICS
DOCUMENTS GENERATED PER YEAR

	<u>1992</u>	<u>1993</u>
NCRs	139	273
DRs	53	662
QA FINDINGS	69	90
QA OBSERVATIONS	<u>35</u>	<u>36</u>
TOTALs	296	1025

CORRECTIVE ACTION PROGRAM TREND

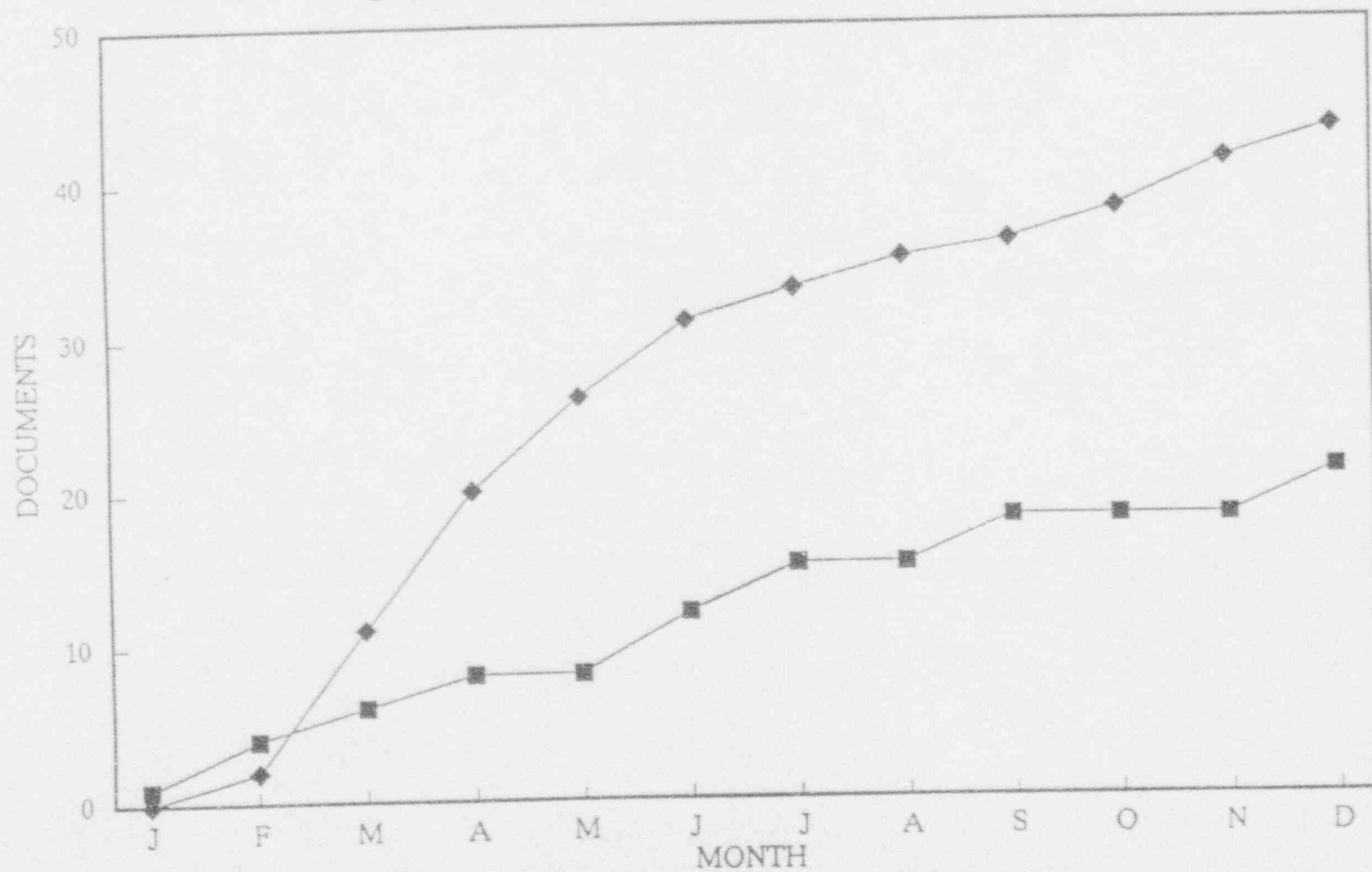


■ NCRs & DRs

— DATA FIT CURVE*

*EXCLUDES OUTAGE DATA MARCH - JULY

CUMULATIVE LERs WRITTEN



■ 1992 LERs ◆ 1993 LERs

INCLUDES SUPPLEMENTS

CORRECTIVE ACTION PROGRAM UPGRADE

PROGRAM PROCEDURES WITH PRELIMINARY APPROVAL:

0.5 CONDITION REPORTING

0.5.1 DISPOSITION AND CLOSURE OF CATEGORY 1 CONDITION REPORTS

0.5.2 DISPOSITION AND CLOSURE OF CATEGORY 2 CONDITION REPORTS

0.5.3 DISPOSITION AND CLOSURE OF CATEGORY 3 CONDITION REPORTS

0.5.4 DISPOSITION OF CATEGORY 4 AND 5 CONDITION REPORTS

0.5.5 CONDITION REPORTING PROGRAM ADMINISTRATIVE REQUIREMENTS



CORRECTIVE ACTION PROGRAM UPGRADE

KEY ACTIVITIES REMAINING:

- *CAP/ROOT CAUSE TRAINING* - *MARCH 1994*
- *FINAL APPROVAL OF PROCEDURES* - *MARCH 1994*
- *EFFECTIVENESS REVIEW* - *OCTOBER 1994*
(COMMON CAUSE ANALYSIS)

