

UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION IV

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

APR - 8 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 MEETINGS HELD FEBRUARY 14 AND APRIL 4, 1994

This refers to the management meetings, open to public observation, conducted on February 14 and April 4, 1994, at the Region IV office in Arlington, Texas, concerning activities authorized by NRC License DPR-46 for the Cooper Nuclear Station. Attendees at the meetings are listed in Attachments 1 and 2.

The purpose of the meetings was for you to present to the NRC your progress in developing and implementing the Near Term Integrated Enhancement Program. The Near Term Integrated Enhancement Program was initially formulated in February 1994. During the February 14 meeting, some of the most significant items in the enhancement program were discussed; however, due to time constraints, the discussions were delayed and it was agreed that a followup meeting would be scheduled to complete the discussions. During the April 4 meeting, it was agreed that periodic updates would be provided to the NRC staff concerning your progress in implementing the performance improvement activities. The next meeting was tentatively scheduled to be at the Cooper Nuclear Station in May 1994.

At these meetings, you presented to the NRC the results of your internal assessment activities, the purpose of the Near Term Integrated Enhancement Program, how you plan to maintain the Near Term Integrated Enhancement Program, and various problems you have encountered in implementing the program. The focus of the February 14 meeting was your response to our concern regarding current management's ability to effect the changes needed in the performance of activities at Cooper Nuclear Station. You addressed the realignment of the current management structure but, with one exception, had made no changes in the managers comprising the management team at Cooper Nuclear Station. You also noted that additional changes were planned at the supervisory levels. During the April 4 meeting we were not provided with additional information regarding the management changes you stated were needed to achieve the objectives of the improvement efforts at Cooper Nuclear Station.

Regarding the Near Term Integrated Enhancement Program, you presented the status of specific actions and the progress to date in implementing the overall goals of your upgrade effort. During the discussions, you outlined some of the challenges that you faced in implementing the integrated

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Nebraska Public Power District

enhancement program (i.e., changing of culture in the maintenance department, employee ownership of required improvements, and rigor and consistency in handling of reactive issues) and discussed in general terms the actions you have initiated to address the challenges. The NRC staff expressed particular interest in your progress on the Nuclear Power Group Business Plan, which is under development and will contain the elements necessary to ensure that the performance improvements realized by the Near Term Integrated Enhancement Program are maintained and that your overall performance continues to improve in all areas important to safe operation of Cooper Nuclear Station. A summary of the information you provided is in Attachments 3 and 4.

It is our opinion that these meetings were beneficial and have provided our staff with a better understanding of your progress in implementing the Near Term Integrated Enhancement Program and the efforts you have applied to implement this 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.

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 February 14
- 2. Attendance List April 4
- 3. Near Term Integrated Enhancement Program
- 4. Cooper Nuclear Station Performance Improvement

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 Public Power District

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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

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

Nebraska Public Power District -4-

E-Mail report to D. Sullivan (DJS)

bcc to DMB (IE45)

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

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JGagliardo;df	TPGwynn	ABBeach	
4/ 6/94 70	4/0/94	4/8/94	

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Nebraska Public Power District -4-

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RIV: C. DRP/C	D: DRS Janja	DEDRP	
JGagliardo;df	TPGwynn	ABBeach	
4/ 6/94 70	4/0/94	4/15/94	

Key Mr.

MEETING: NEBRASKA PUBLIC POWER DISTRICT

SUBJECT: INTEGRATED ENHANCEMENT PROGRAM

DATE: February 14, 1994

ATTENDANCE LIST

NAME	ORGANIZATION	POSITION TITLE
JOHN MONTGOMERY	RIV	DEP. RA
LARRY CAMPER	RIV	Dep Deedie DRSS
T.P. Gwynn	RTZ	DIRECTIR, DRS
A. B. BEARN	RII	", DRP
JOHN L PELLET	RIV	CHIEF, DRS BRANCH, DRS
RONALD A. KOPRIVA	RIV	SENIGR RESIDENT JUSPERTOR
Elmo Collins	RIT	Project Engineer DRS Eng Bronch
T Westermon	KIL	DRS Eng Dranch
J Gagliardo	RIV	DRP Branch Chif
G.L. Constable	RE	Chief Plant Sugar + Branch, DR.
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MEETING: NEBRASKA PUBLIC POWER DISTRICT

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ATTENDANCE LIST

NAME	ORGANIZATION	POSITION TITLE
Rick Gardner	NPPO	Plant Manger
	NPPD/INPO	Engineering Mar. Vice President, Nuclear
James yunch Guy Josef	NPPO	
Jota M. MEACHAM	NPAD	SR. Nuc. D.V. MGR. SAF. ASSC.
VERNEL WOISTENHOLM	NPPD	DEV. MGR - OA
E.M. MACE	NPPD	Sn. MGN. SZTE SUMMET
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MEETING: NEBRASKA PUBLIC POWER DISTRICT

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DATE: February 14, 1994

ATTENDANCE LIST

Public

NAME	ORGANIZATION	POSITION TITLE
Jim Parker	Midwest Pourer	Senior Engineer

MEETING: PUBLIC MANAGEMENT MEETING - COOPER

SUBJECT: INTEGRATED ENHANCEMENT PLAN

DATE: April 4, 1994

ATTENDANCE LIST

NAME	ORGANIZATION	POSITION TITLE
PETER KOLTAY	NRC	Section Chief NRR/SIB
Pannio J. KOPRIVA	NRC	Surac Resignar Tuspacron
WILLIAM BECKNER	NRC	DIRCTOR PDIN-1
KEVIN A. CONNAUGHTON	NRC/ NRR	Project Manager
C. J. Raulk	NRC RIT	Reactor Inspector
EECOLLINS	NRC. RIV	TEAM LEADER
JOSEPH 1. TAPIA	NRC	ACTING PROJECT ENGINEER
Paula A. Goldberg	NRC	Reactor Inspector
T.F. Westerman	NRC/RIT	chief, Eng. Branch
RYAN E. LANTZ	NIZE /RIV .	REACTOR ENGINEER
JAMES C. PARKER	MIDWEST POWER	SR. ENGINEER
VERNEL WOLSTENHOLM	NPPO	DEV HER-GA
JAMES E. LYNCH	NPPD	RAWT ENGINEERING MAR
Nit Gardyer	NYID	Plant Marezz
E.M. MACE	NPPO	SR. MGL. SITE SUPPORT
J.M. WEAGHAM	NPID	SR. MUC DU MGR SAGETY A
Wayne C Walker	NRC	Resident Inspector - CNS
Jocelyn Mitchell	USNRC	Acting Deputy, Dir DRS
T.P. Gwynn	NEC RIV	Director, DRS
P. Harrell	NRC RIV	Acting Director, DRP
J. E. Gagliardo	NRC RIV	Branch Chief, DRP
L.J. Callan	NRC RIV	Regional Administrator

ATTACHMENT 3

COOPER NUCLEAR STATION

NEAR TERM INTEGRATED ENHANCEMENT PROGRAM

COOPER NUCLEAR STATION MANAGEMENT

MEETING WITH

NUCLEAR REGULATORY COMMISSION

APRIL 4, 1994



NPPD/NRC MANAGEMENT MEETING

- INTRODUCTION
- NPPD INTERNAL ASSESSMENT ACTIVITIES
- PURPOSE OF NEAR TERM INTEGRATED ENHANCEMENT PROGRAM
- DEVELOPMENT/MAINTENANCE OF INTEGRATED ENHANCEMENT PROGRAM
- STATUS OF INTEGRATED ENHANCEMENT PROGRAM ITEMS
- RESULTS
- PROBLEMS



NPPD INTERNAL ASSESSMENT ACTIVITIES

- INTEGRATED ENHANCEMENT PROGRAM INPUTS
 - CNS PERFORMANCE ASSESSMENT PROJECT
 - CNS CORRECTIVE ACTION PROGRAM SELF ASSESSMENT
 - ENFORCEMENT ISSUES INVESTIGATION TEAM
 - COMMON CAUSE ANALYSIS STUDY
 - CNS ENGINEERING PERFORMANCE ASSESSMENT



NPPD INTERNAL ASSESSMENT ACTIVITIES

- OTHER ASSESSMENTS PERFORMED
 - OUTAGE PERFORMANCE ASSESSMENT
 - HUMAN PERFORMANCE ASSESSMENT
 - FIRE PROTECTION ASSESSMENT
 - MOV ASSESSMENT
 - DESIGN CHANGE ASSESSMENT
- PLANNED ASSESSMENTS FOR 1994
 - DESIGN ENGINEERING
 - MAINTENANCE
 - VARIOUS EXISTING PROGRAMS



NPPD INTERNAL ASSESSMENT ACTIVITIES

IDENTIFIED AREAS OF WEAKNESS

- MANAGEMENT
 - ESTABLISH/COMMUNICATE EXPECTATIONS
 - MONITOR PERFORMANCE
 - FEEDBACK/ACCOUNTABILITY
- QUESTIONING ATTITUDE
- IDENTIFICATION OF PROBLEMS AND IMPLEMENTATION OF CORRECTIVE ACTION
- PROCEDURE AND PROGRAM ADEQUACY/ADHERENCE



PURPOSE OF NEAR TERM INTEGRATED ENHANCEMENT PROGRAM

- PRIORITIZE NPPD ASSESSMENT FINDINGS AND NRC CONCERNS
- PLAN AND SCHEDULE THE ACCOMPLISHMENT OF PRIORITY ISSUES
- MONITOR AND MEASURE PERFORMANCE IMPROVEMENT AND EFFECTIVENESS
- ENHANCE EMPLOYEE AWARENESS AND GOAL SETTING
- PROVIDE INPUT FOR BUSINESS PLAN (LONG TERM PLAN)



DEVELOPMENT/MAINTENANCE OF INTEGRATED ENHANCEMENT PROGRAM

- DEVELOPED BY IDENTIFYING AND PRIORITIZING KNOWN ISSUES
 - NPPD INTERNAL ASSESSMENT RESULTS
 - NRC CONCERNS
- INDEPENDENT OUTSIDE REVIEW TO VERIFY ADEQUACY
- MAINTAINED THROUGH
 - MONTHLY HARD COPY UPDATES
 - SEMI-MONTHLY STAFF REVIEW UPDATES
 - MONTHLY MANAGEMENT REPORTS



INTEGRATED ENHANCEMENT PROGRAM STATUS

- QUALITY ASSURANCE
- SITE SUPPORT
- SAFETY ASSESSMENT
- OPERATIONS
- MANAGEMENT
- NUCLEAR POWER GROUP



RESULTS

- INTEGRATED ENHANCEMENT PROGRAM SCHEDULE
- MANAGEMENT
 - MENTORS BEING USED
 - EMPHASIS ON EMPLOYEE AND NRC COMMUNICATIONS
 - QA SURVEY INDICATES PROGRESS
 - MANAGEMENT DEVELOPMENT WORKSHOPS
 - PRIORITIZATION OF ENGINEERING BACKLOG
 - STAFFING ADDITIONS



RESULTS

- QUESTIONING ATTITUDE/IDENTIFICATION OF PROBLEMS AND IMPLEMENTATION OF CORRECTIVE ACTION
 - RHR-27A LEAKAGE DISCOVERED DURING SURVEILLANCE
 - CONSERVATIVE DECISION PROCESS
 - · APPROACH TO OUTAGE SAFETY PROTECTED SYSTEMS
 - USED AS AN EXAMPLE FOR FUTURE PLANT PROBLEMS
 - INCREASED USE OF PROBLEM RESOLUTION TEAMS TO FOCUS EFFORTS ON SIGNIFICANT PROBLEMS
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RESULTS

- PROCEDURE AND PROGRAM ADEQUACY/ADHERENCE
 - COMMUNICATED MANAGEMENT EXPECTATIONS REGARDING INADEQUATE PROCEDURES AND WORK AROUNDS
 - INITIATED MAINTENANCE PROCEDURE UPGRADE, WHICH INCLUDES DEFINING SKILL-OF-THE-CRAFT
 - IMPLEMENTED PLAN FOR PROGRAM ASSESSMENT
 - RECOGNIZED NEED FOR PROGRAM MANAGERS



PROBLEM AREAS

- CULTURE IN THE MAINTENANCE DEPARTMENT
- MANAGEMENT BY WALKING AROUND
- EMPLOYEE OWNERSHIP OF REQUIRED IMPROVEMENTS
- PERFORMANCE MONITORING CAPABILITIES
 - TRENDS AND FEEDBACK IN INTERIM
- RIGOR AND CONSISTENCY IN HANDLING REACTIVE ISSUES
- OVERLY COMPLICATED KEY WORK PROCESSES



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ID 1	Name GRH 94-01, Establish Period	dic Communications Meetings	Jan Feb Mar	Apr May Jun	Jui Aug Sep	Oct Nov Dec	Jan Feb Mar
2	GRH 94-02, "One Over One						
3	GRH 94-03, Supervisor Mee	ting with Subordinates					
4	GRH 94-04, Management N	fentors in Key Areas					
5	GRH 94-05, Conduct Study	for Appropriate Staffing at CNS					
6	GRH 94-06, Additional Pers	onnel to Meet Needs of NPG					
7	GRH 94-07, VP Meetings or	n Staffing Study					
8	MGMT 94-01, Strengthen C	CNS Safety Culture					
9	MGMT 94-02, Develop an N	NPG Business Plan					
10	MGMT 94-03, Prioritize Out	standing Work					
11	RLG 94-01, Develop Program	m to Review Maintenance Procedures					•
12							•
13	RLG 94-03, Upgrade System Engineer Program						•
14			Commission and			•	
15	RLG 94-05, Evaluate PIV, IS	SI, IST and LLRT Programs	THERE				
16	RLG 94-06, Engineering Bac	klog					
17	RLG 94-07, Maintenance Ba				•		
18	RLG 94-08, Review Qual. &						
19	RLG 94-09, Improve Operations Communications				•		
20	JMM 94-01, Upgrade Corre	ctive Action Program					
21 JMM 94-02, Improve Operating Experience Review Program				>			
22	JMM 94-03, Enhance Human Performance Evaluation Program						
23	JMM 94-04, Review/Revise	Operability Determination Process					
Date	n: 3/31/94	Critical Progress	Summary Rolled Up				

		Qtr 1, 1994	Otr 2, 1994	Qtr 3, 1994	Qtr 4, 1994	Qtr 1, 1995 Jan Feb Mar
1D 24	Name JMM 94-05, Develop Independent Review Group	Jan Feb Mar	Apr May Jun	Jul Aug Sep	Oct Nov Dec	Jan Heb Mar
25	JMM 94-06, Develop NPG-Wide Priority System	- Former				
26	JMM 94-07, Implement Industry Advisory Group		-			
27	EMM 94-01, NPG Manager & Supervisor Management Skills Training					
28	EMM 94-02, Develop User-Friendly Tracking System for Training & Certification					
29	EMM 94-03, Develop Comprehensive System Engineer Training Program for CNS					
30	EMM 94-04, Root Cause Training					
31	EMM 94-05, CAP Training		•			
32	EMM 94-06, Implement Recommendations of Fire Protection Assessment					
33	EMM 94-07, Conduct Compliance Review of CNS Training Program		1			
34	DAW 94-01, Evaluate Licensing Department Organization					
35	DAW 94-02, Issue NPG Directives Supporting SPPI					
36	REW 94-01, Engineering Program Responsibility Assignment			•		
37	REW 94-02, Nuclear Engineering & Construction Division Self-Assessment					
38	REW 94-03, Evaluate NPG Configuration Control & Design Change Process	Constant of the second se			•	
39	VLW 94-01, Revise Self-Assessment Program		•			
40	VLW 94-02, Enhance CAP Audits/QA Trend Report				No. inter	
41	VLW 94-03, Establish QA Assessment/Evaluation Program					
42	VLW 94-04, Upgrade Internal Audit & Surveillance Program			-		