

Appendix

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Systematic Assessment of Licensee Performance

Report: 50-298/82-24

Docket: 50-298

Licensee: Nebraska Public Power District  
P. O. Box 499  
Columbus, Nebraska 68601

Facility Name: Cooper Nuclear Station

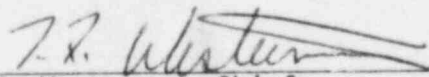
Appraisal Period: July 1, 1981 - June 30, 1982

Appraisal Completion Date: August 31, 1982

Licensee Meeting: September 28, 1982

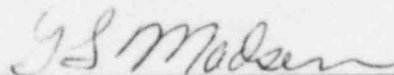
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## I. Introduction

The NRC established a Systematic Assessment of Licensee Performance (SALP) program. The SALP program is an integrated NRC staff effort to collect available observations and data on an annual basis and to evaluate licensee performance based on these observations and data. Emphasis is placed upon NRC understanding the licensee's performance in the 12 functional areas listed in the body of this report and discussing and sharing this understanding with the licensee. SALP is an integrated part of the regulatory process used to assure licensee's adherence to the NRC rules and regulations. SALP is oriented toward furthering NRC's understanding of the manner in which: (1) the licensee management directs, guides, and provides resources for assuring plant safety; and (2) such resources are used and applied. The integrated SALP assessment is intended to be sufficiently diagnostic to provide meaningful guidance to licensee management related to quality and safety of plant operation, modifications, and new construction.

The NRC SALP Board, which is composed of NRC personnel who are knowledgeable of the licensee activities, met on August 31, 1982, to review the collection of data and observations to assess the licensee performance in the 12 selected functional areas.

This SALP report is the SALP Board's assessment of the licensee's safety performance at the Cooper Nuclear Station during the period of July 1, 1981, to June 30, 1982.

The results of the SALP assessments in the selected functional areas will be discussed with licensee management personnel at a meeting to be held on September 28, 1982.

## II. Summary of Results

In summary, the licensee's performance was classified as Category 1 in eight areas, Category 2 in two areas, and Category 3 in two areas. The licensee's performance was rated as Category 1 by NRR.

## III. Criteria

Licensee performance is assessed in 12 selected functional areas. Each of these functional areas represents an area significant to nuclear safety and its related environment and is a programmatic area for the NRC inspection program.

Evaluation criteria as listed below was used, as appropriate, in each of the functional area assessments:

1. Management involvement in assuring quality
2. Approach to resolution of technical issues from safety standpoint

3. Responsiveness to NRC initiatives
4. Enforcement history
5. Reporting and analysis of reportable events
6. Staffing (including management)
7. Training effectiveness and qualification

In addition, SALP Board members considered other criteria, as appropriate.

Based upon the SALP Board assessment, each functional area evaluated is classified in one of three performance categories. The definitions of the performance categories are:

Category 1. Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2. NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

Category 3. Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

#### IV. Performance Analysis

##### A. Plant Operations

###### 1. Analysis

There is a continuous inspection of this area by the resident inspector. The two violations listed below involved plant operations:

- a. Failure to follow procedure for making temporary changes to procedures. (Severity V, 8125)
- b. Failure to adhere to contaminated area posted clothing requirements. (Severity V, 8117)

The three licensee event reports (LER's) listed below can be attributed to plant operations:

- a. Liquid waste discharge was made from the floor drain sample tank without adequate sampling and analysis of the batch as required by the Environmental Technical Specification. (LER 81-25)
- b. After stopping one reactor recirculating pump, the minimum critical power ratio (MCPR) was below the MCPR operating limit without the initiation of corrective actions. (LER 82-004)
- c. The drywell/torus dp was reduced below limits during the performance of a residual heat removal system full flow test (LER 82-007)

###### 2. Conclusion

The licensee is considered to be in performance Category 1 in this area.

Management maintains a serious and active interest in safe, efficient plant operations. The plant's good operating history is reflective of management attention and concern.

###### 3. Board Recommendations

The licensee's engineering department has lost six and hired six personnel during this period; whereas, operations department has lost eight and hired nine. Operating crews are minimally staffed, which has required a substantial increase of personnel overtime in order to meet normal shift manning and crew training requirements. The licensee should continue efforts to increase staffing. Operating procedures are not utilized to the fullest extent, particularly outside of the control room area. NPPD management should place increased emphasis on the need to use and properly adhere to approved plant procedures. This area may be considered for reduced NRC attention.

## B. Radiological Controls - Radiation Protection

### 1. Analysis

This area has been inspected on a continuing basis by the resident inspector and periodically by region-based inspectors. The eight violations listed below involved radiation protection:

- a. Failure to post a radioactive material storage area. (Severity IV, 8220)
- b. Failure to post a radiation area. (Severity IV, 8220)
- c. Failure to make required surveys. (Severity IV, 8220)
- d. Failure to maintain records of surveys. (Severity V, 8220)
- e. Failure to follow air sample analysis procedures. (Severity IV, 8220)
- f. Failure to follow radiation work permit (RWP) procedures. (Severity IV, 8220)
- g. Failure to post a radiation area. (Severity V, 8114)
- h. Failure to provide an adequate personnel access barrier during radiography operations. (Severity V, 8216)

### 2. Conclusions

The licensee is considered to be in performance Category 3 in this area.

The above identified violations indicate a lack of attention by the licensee to ensure that NRC requirements are met and health physics procedures are followed.

The licensee has not established an ALARA program that meets the recommendations of Regulatory Guide 8.8. This item was originally identified during the 1980 Health Physics Appraisal Program.

### 3. Board Recommendations

It is recommended that the NRC and licensee place increased attention to this area. The NRC will thoroughly review the licensee's corrective action for the above violations and their progress toward establishing a proper ALARA program during the upcoming fiscal year.

## C. Radiological Controls - Radioactive Waste Management, Transportation, Effluent Control and Monitoring, and Environmental Surveillance

### 1. Analysis

This area has been inspected on a continuing basis by the resident inspector and periodically by region-based inspectors. The following

LER can be attributed to this area:

Inadvertent draining of a suppression chamber level instrument reference leg while collecting a torus water sample. (LER 82-009)

The following inspector-identified item can be attributed to effluent control and monitoring:

The licensee's program for environmental controls does not include routine analysis to verify that the Environmental Technical Specification is not exceeded. (8202-01)

The following item can be attributed to transportation:

On June 25, 1982, a shipment of radioactive waste from Cooper Nuclear Station was received at the State of Nevada radioactive waste disposal site and found to have radiation levels at 6 feet from the side of the trailer in excess of permissible DOT levels. NPPD Burial Permit No. Q401 was subsequently suspended pending appropriate corrective action by the licensee.

## 2. Conclusion

The licensee is considered to be in an overall performance Category 1 in these areas.

The chemistry and health physics department has not lost any personnel during this appraisal period. Three additional personnel have been added to their staff. Staffing stability, in combination with the personal professionalism that is displayed by members of the C & HP department has enhanced efficient and safe plant operations.

## 3. Board Recommendations

The licensee should continue to emphasize to chemistry and health physics personnel their job responsibilities and need to review, use, and properly adhere to approved station procedures. This area may be considered for reduced NRC attention.

## D. Maintenance

### 1. Analysis

This area has been inspected on a continuing basis by the resident inspector and periodically by region-based inspectors. The violation listed below involved maintenance:

Failure to follow procedures during reactor vessel head detensioning operations. (Severity IV, 8216)

The three LER's listed below can be attributed to maintenance:

- a. Uncalibrated temperature switches were installed in the main steam system. (LER 81-023)
- b. Level indication switch was improperly aligned. (LER 82-001)
- c. Number one diesel generator trip due to an improperly closed PT disconnect switch door. (LER 82-010)

The deviation listed below can be attributed to maintenance:

Welding procedures were not modified and approved to permit reduced weld overlay operations. (8119-01)

2. Conclusion

The licensee is considered to be in performance Category 1 in this area.

Management has an aggressive attitude toward the timely identification, repair, and restoration of plant equipment and systems that require repair or preventive upkeep.

3. Board Recommendations

The licensee should place increased emphasis on the need for personnel to review and follow approved plant procedures during the performance of routine activities. This area may be considered for reduced NRC attention.

E. Surveillance and Inservice Testing

1. Analysis

This area has been inspected on a continuing basis by the resident inspector. No violations were identified during this appraisal period.

2. Conclusion

The licensee is considered to be in performance Category 1 in this area.

Station management has an effective system for scheduling and performing plant equipment and systems surveillances. The 1982 postrefueling/prestartup testing program appeared thorough and complete.

3. Board Recommendations

This area may be considered for reduced NRC attention.

F. Fire Protection and Houskeeping

1. Analysis

This area has been inspected on a continuing basis by the resident inspector and periodically by region-based inspectors. No violations were identified during this appraisal period.

Administration of the fire protection program, controls of combustible materials, welding and cutting operations, housekeeping, fire brigade organization and training, and surveillance testing of equipment are properly implemented and maintained.

Monthly safety meetings are held on the plant site. Supplemental information and guidance relative to fire protection and housekeeping are provided to site personnel as deemed necessary during those meetings.

2. Conclusion

The licensee is considered to be in performance Category 1 in this area.

Management has an exceptionally positive attitude in this area and provides support as required.

3. Board Recommendations

This area may be considered for reduced NRC attention.

G. Emergency Preparedness

1. Analysis

This area has been inspected on a continuing basis by region-based emergency preparedness personnel. The two violations listed below involved emergency preparedness, e.g., public notification system:

- a. Six of thirty-two mobile siren units were not operable, nor capable of being made operable, in the time required to perform notification during the period February 1, 1982, to March 11, 1982. (Severity III, 8211)
- b. The licensee made an apparent material false statement concerning the status of the prompt notification system as reported to the NRC. (Severity II, 8211)

An unannounced inspection was performed during this evaluation period to determine the status of the licensee's public notification system. The inspection revealed that some residences, located within the 10-mile emergency planning zone but outside of the areas covered by fixed sirens, would not have been notified of an incident at Cooper Nuclear Station. The inability to notify some residences of an incident at CNS in a complete and timely manner was attributed to an inadequate number of available and proven operable mobile sirens and also the length of time that would have been required to travel designated



mobile routes to notify affected residences by the use of the mobile sirens. The preceding discrepancies and other significant findings identified during the unannounced inspection, were addressed in a Confirmation of Action Letter dated March 12, 1982.

An emergency preparedness appraisal was performed by region-based inspectors during this evaluation period. Nine significant findings were identified and were addressed in a Confirmation of Action Letter dated September 4, 1981. Also, an additional 49 items were identified during the appraisal, which the licensee was required to consider for improvement in order to achieve an adequate emergency preparedness program.

In conjunction with the emergency preparedness appraisal, the CNS Emergency Plan was reviewed by the Emergency Preparedness Licensing Branch, Division of Emergency Preparedness, Office of Inspection and Enforcement. The review identified numerous deficiencies in the CNS Emergency Plan.

An emergency exercise was conducted during this evaluation period. The joint exercise involved local, state, and federal agencies. Five inspector-identified items resulted from the emergency exercise.

## 2. Conclusion

The licensee is considered to be in performance Category 3 in this area due to the following:

- a. The licensee did not demonstrate the capabilities of the shift supervisor to conduct the emergency response and make applicable operating decisions.
- b. The licensee did not have adequate backup facilities for the interim Emergency Operations Facility (EOF). Provisions provided in the EOF for NRC and other emergency response personnel were insufficient.
- c. The licensee failed to meet the design objectives of its public notification system and did not meet the federal requirements of 10 CFR 50, Appendix E.

## 3. Board Recommendations

The licensee should conduct training of emergency response personnel such that the absence of several key personnel will not jeopardize their emergency response capabilities. The licensee should demonstrate; (1) off-shift augmentation capability; (2) activation of the entire public notification system; and (3) emergency response capabilities of personnel, assuming the unavailability of the station superintendent and the chemistry/health physics supervisor. The licensee and the NRC should increase attention in this area.

## H. Security and Safeguards

### 1. Analysis

This area has been inspected on a continuing basis by the resident inspector and periodically by region-based physical security inspectors. No violations were identified during this evaluation period.

### 2. Conclusion

The licensee is considered to be in performance Category 1 in this area.

The site security force continues to maintain a high level of professionalism. Management involvement is also reflected in their performance.

### 3. Board Recommendations

This area may be considered for reduced NRC attention.

## I. Refueling

### 1. Analysis

The resident inspector performed a review of the 1982 prerefueling, refueling, and postrefueling operations and surveillance testing program. No violations were identified in this area.

### 2. Conclusion

The licensee is considered to be in performance Category 1 in this area.

Station personnel have continued to display a well planned and executed refueling operation.

### 3. Board Recommendations

This area may be considered for reduced NRC attention.

## J. Licensing Activities

The NRR project manager for CNS has evaluated the licensee in this area. His evaluation appears as Attachment 1 of this report.

## K. Personnel Training

### 1. Analysis

This area has been inspected on a continuing basis by the resident inspector and periodically by region-based inspectors. The violation listed below involved personnel training:

Failure to follow requirements of the approved operator requalification program. (Severity V, 8114)

The following inspector-identified items can be attributed to personnel training:

- a. The licensee is behind schedule for operator requalification training and the NRC has doubts concerning the licensee's ability to meet minimum requalification training requirements on schedule. (8114-05)
- b. A method is lacking for recording reactivity manipulation. (8114-06)
- c. Lesson plans for CNS fire protection training were not yet available. (8114-07)
- d. The Safety Review and Audit Board (SRAB) endorsed a NPPD task force recommendation for the need of a comprehensive training plan for offsite staff, but it has not been implemented. (8212-01)

Due to a shortage of on-crew personnel, one of two permanently assigned CNS training instructors has had to stand assigned operations group shift positions. The shift assignments have reduced the overall effectiveness of the CNS operator licensing formal classroom training/requalification training programs.

NRC reactor operator (RO) and senior reactor operator (SRO) examinations were administered twice during this appraisal period. Overall, three of five examinees passed the RO examinations and two of four examinees passed the SRO examinations.

## 2. Conclusion

The licensee is considered to be in performance Category 2 in this area.

The adequacy of the CNS requalification training program is in question. The size of the training department staff is marginal. Reduced formalized classroom training is compensated by conducting training of personnel while assigned shift crew duties. Unfortunately, attentiveness to watchstation requirements and responsibilities or concentration on lectures or training materials is sacrificed when training is conducted in such a manner.

## 3. Board Recommendations

Licensee management should continue efforts to increase the staffing size of the training department and operating crews so that sufficient manpower will be available to permit segregated, uninterruptable classroom instruction. The licensee should continue implementation of the upgraded license training and requalification program. Licensee management should consider obtaining simulator time at a facility more closely reflective of the CNS control room and types of installed plant equipment which are operated at the control room boards. NRC attention should be maintained at normal levels.

L. Administration and Quality Assurance

1. Analysis

This area has been inspected on a periodic basis by region-based inspectors. The two violations listed below involved this area:

- a. The SRAB failed to review the status of the audit program. (Severity IV, 8114)
- b. The licensee failed to identify in a procedure, shelf-life requirements and controls of shelf-life materials. (Severity V, 8204)

The following inspector-identified items can be attributed to this area:

- a. The licensee has not provided a summary of the safety evaluations conducted for minor design changes in the 1979 and 1981 annual reports. (8101-03, 8206)
- b. The CNS Technical Specification does not include current industry recommendations regarding charcoal absorber laboratory tests. (8202-02)
- c. Squib manufacturing dates need verification. (8204-03)
- d. CNS Administrative Procedure 1.11 needs to be revised to include Quality Assurance Instruction (QAI-9), "Guidelines for Establishing Classification of Components and Materials." (8204-04)

2. Conclusion

The licensee is considered to be in performance Category 2 in this area.

The failure of the SRAB to adequately monitor the status of the audit programs is considered to be reflective on the oversight provided by the corporate management.

3. Board Recommendation

The licensee should give increased attention to the SRAB functions. The NRC should give increased attention to corporate functions related to SRAB.

V. Supporting Data and SummariesA. Violation and Deviation Data

Functional Area	Violation Severity Level					Deviation
	I	II	III	IV	V	
Plant Operations					2	
Radiological Controls - Radiation Protection				5	3	
Radiological Controls - Radioactive Waste Mgm't						
Maintenance				1		1
Surveillance and Inservice Testing						
Fire Protection and Housekeeping						
Emergency Preparedness		1	1			
Security and Safeguards						
Refueling						
Licensing Activities						
Personnel Training					1	
Administration and Quality Assurance				1	1	
TOTALS	0	1	1	7	7	1

B. Licensee Event Reports (LER's)

The Regional SALP Board reviewed the LER's which had event dates during the period of July 1, 1981, through June 30, 1982. The review included LER's 50-298/81-019 through 81-026, and 82-001 through 82-014. The previous evaluation period of 1980-1981 was reviewed for causally-linked LER's.

The cause category and number of LER's per category during this report period are as follows:

<u>Cause Category</u>	<u>Number</u>
Personnel Error	7
Design, Manufacturing, Construction/Installation	4
External Cause	0
Defective Procedures	1
Component Failure	10
Other	0
Causally-Linked	5

There was one generic area identified during the review of LER's, which is summarized below:

Failure to adhere to approved plant procedures (LER's 81-023, 81-025, 82-001, 82-004, 82-009, 82-010, 82-012)

There were five causally-linked items identified during this period as listed below:

1. Emergency Diesel Generators Vibration Induced Failures - (LER's 81-019, 81-020, and 81-021)
2. Barton/Yarway Level Indicating Switches Setpoint Drift - (LER's 80-38, 81-26, and 82-01)
3. RHR-MO-26B Failure During Closing Operation - (LER's 81-03 and 82-03)
4. MSIV-86A Closing Time - (LER's 80-49 and 82-05)
5. Model PSA-10 Mechanical Snubber Failures - (LER's 81-09 and 82-13)

The licensee is responsive in each of the above areas.

C. Licensee Activities

1. Major Outages

The licensee had two scheduled major outages during this appraisal period.

Outages occurred during the periods of September 12-November 6, 1981, and May 21-July 7, 1982, and were for main turbine LP turbine rotor replacement and reactor refueling, respectively. No major unscheduled outages occurred.

## 2. Unscheduled Shutdowns - Reactor Scrams

The licensee had three unscheduled reactor scrams during this period and are listed below:

- 81-3 - Inadvertant intermediate range monitors high flux scram caused by excessive cold feedwater addition. The reactor was subcritical and being shutdown in preparation for a scheduled outage prior to the scram.
- 81-4 - Reactor vessel low water level scram caused by the loss of condensate flow to the reactor. Reactor shutdown was in progress prior to the scram.
- 82-1 - Reactor scram due to main turbine control valve fast closure which was a direct result of the main generator tripping due to the loss of excitation voltage. The reactor was at full power prior to the scram.

## 3. Power Limitations

The reactor was not limited in power level during this period.

## 4. Significant Modifications

The licensee continued with modifications applicable to the Mark I Containment Torus Modification Program and NUREG 0737 requirements.

## D. Major Inspection Activities

The NRC performed the following major inspection activities during this appraisal period:

- 1. An inspection was conducted during the period of March 9-11, 1982. The inspection included the annual emergency exercise and coordinated meetings with the licensee, the Federal Emergency Management Agency, State, and local agencies. The NRC inspectors concluded that the CNS emergency response organization demonstrated the capability to protect the health and safety of the public. No violations or deviations were identified. Five open items were discussed in Section 7 of the report. (8208)
- 2. A special inspection was conducted March 11 and March 22-23, 1982. The inspection was performed to determine the capability of the emergency warning system to promptly notify the population within the plume exposure pathway of the emergency planning zone as contained in 10 CFR 50, Appendix E.4.d and followup on the licensee's corrective actions on the emergency warning system. One apparent violation was

identified which indicated a lack of capability for providing prompt public notification of a portion of the emergency warning system, e.g., 6 of 32 mobile siren units were not operable. (Severity III, 8211)

#### E. Investigations and Allegations Review

The NRC conducted two investigations during this appraisal period. A summary of each investigation is given below:

1. An investigation was conducted on August 11-September 30, 1981. The investigation was conducted to find evidence of alleged intimidation by a Marshall Maintenance Company supervisor toward employees, in that the employees were instructed to record lower radiation readings from their individual dosimeters than actually received, while working in radiation areas. The investigation disclosed no evidence that would support the allegation. (8116)
2. An investigation was conducted at the request of the Region IV Administrator to determine the circumstances surrounding the licensee's submittal of a letter to the NRC dated February 8, 1982, which contained an apparent material false statement regarding the status of CNS's compliance with the requirements of 10 CFR Part 50, Appendix E, Section IV.D.3, and to further determine if the licensee intentionally conveyed the false information in a briefing to the NRC on March 9, 1982. The investigation provided sufficient evidence to warrant the issuance of a Notice of Violation and Proposed Imposition of Civil Penalty. (Severity II, 8209/8211)

#### F. Escalated Enforcement Actions

##### 1. Civil Penalties

August 9, 1982, letter of proposed Imposition of Civil Penalty relating to the licensee's prompt public notification system.

##### 2. Orders

August 9, 1982, letter of Order Modifying License relating to the licensee's comprehensive plan of action that will include an independent appraisal of site and corporate management organizations and functions, and recommendations for improvements in communications, management controls, and oversight.

##### 3. Confirmatory Action Letters

- a. September 10, 1981, letter relating to the results of NRC Emergency Preparedness Appraisal of CNS.
- b. March 12, 1982, letter relating to the licensee's prompt public notification system.



### G. Management Conferences

Three NRC management conferences were held with the licensee's corporate management and are listed below:

1. September 4, 1981, conference related to significant deficiencies that were identified during the NRC Emergency Preparedness Appraisal of CNS.
2. March 11, 1982, conference related to the results of a special inspection that was performed by NRC personnel on March 11, 1982. Inspection findings indicated that a portion of the licensee's prompt notification system was not operable.
3. April 12, 1982, conference related to apparent unacceptable performance by licensee corporate management in matters concerning the licensee's prompt public notification system.

### H. Summary of Significant Strengths and Weaknesses

#### 1. Strengths

NPPD site management and staff have an aggressive attitude toward matters involving nuclear safety. Routine daily operation has been accomplished smoothly and professionally. Outages are well planned and executed. Management is dedicated toward improving plant systems and equipment.

NPPD corporate management and staff have given adequate support to CNS in matters concerning nuclear safety and operational demands. The staff has been very responsive to NRC requirements and licensing concerns.

#### 2. Weaknesses

Site engineering and operations departments have encountered a significant loss of experienced and professional manpower during this period. The loss of experienced personnel places an undue strain onto the existing members of the plant staff and also, has produced problems with meeting the staffing requirements of NUREG 0737.

Failure to use and/or adhere to approved procedures has increased significantly. Licensee management should increase emphasis on the need to review, revise, use, and properly adhere to approved plant procedures.

The need for corporate management to review the adequacy of its internal affairs has been identified to the licensee by the NRC as follows:  
 (1) the issuance of a proposed civil penalty by the NRC to NPPD, and  
 (2) the issuance of an August 9, 1982, NRC Order to Modify License of NPPD. The failure of the SRAB to review the status of the audit program is also considered a potential weakness in oversight by corporate management.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

Facility Name: Cooper Nuclear Station  
Licensee: Nebraska Public Power District  
NRR Project Manager: Byron Siegel

## I. Introduction

This report presents the results of an evaluation of the licensee, Nebraska Public Power District, in the functional area of licensing activities. It is intended to provide NRR's input to the SALP review process as described in NRC Manual Chapter 0516. The review covers the period July 1, 1981 to June 30, 1982.

The approach used for this evaluation was two fold:

1. To select a number of licensing issues which involved a significant amount of staff manpower and solicit comments from the staff on these issues utilizing a modified version of the performance attributes given in the NRC Manual Report. The information was assembled in a matrix which permitted an overall evaluation of the licensee's performance. Input for this evaluation was from seven branches in four NRR divisions.
2. To assess the licensee's performance based on the Project Managers evaluation. Since the staff only interacts with the licensee on individual issues they have a different perspective from the Project Manager who interacts with the licensee on a daily basis.

To obtain what was considered a realistic assessment of the licensee's overall performance it was decided to give each of the areas identified above equal weight in the evaluation.

## II. Summary of Results

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category based on a composite of a number of attributes. The single final rating to be tempered with judgement as to the significance of the industrial elements. Therefore, the Project Manager's individual assessment was factored into the evaluation.

Based on this approach, the performance of Nebraska Public Power District in the functional area - Licensing Activities - is rated Category 1.

## III Criteria

Applicable evaluation criteria, as given in NRC Manual Chapter Appendix 0516 Table 1, were used for this evaluation.

#### IV. Performance Analysis

The licensee's performance evaluation is based on a consideration of seven attributes as given in the NRC Manual Chapter. For the licensing actions considered in this evaluation the attributes associated with management involvement, approach to resolution of technical issues, and responsiveness were the only ones of significance. However, to obtain an indepth evaluation of the applicable attributes two were further sub-divided as follows:

##### Approach to Resolution of Technical Issues

- a) Understanding of Issues
- b) Conservatism of Resolution
- c) Acceptability of Approach
- d) Technical Soundness of Approach

##### Responsiveness to NRC Initiatives

- a) Meeting of Deadlines
- b) Timeliness of Resolution
- c) Acceptability of Resolution
- d) Cooperativeness

The evaluation was based on our review of the following licensing activities:

- Responses to NUREG-0737 Items
- Appendix R Activities
- Mark 1 Containment LTP Program
- Adequacy of Station Electric Distribution System Voltages
- Environmental Qualification
- BWR Scram Discharge Volume Long Term T/S Modifications
- Containment Purge and Vent
- Single Loop Operation
- Control of Heavy Loads
- RPS Power Supply
- STA, Staffing and Overtime Requirements

1. Management Involvement in Assuring Quality. Overall rating for this attribute is Category 1. Nebraska Public Power District (NPPD) has a small licensing staff so most of the Cooper Nuclear Station engineering work is contracted out. Therefore, a significant amount of managerial talent is devoted to contract administration. However, due to the nuclear experience of the key staff members NPPD has demonstrated above average managerial capability and technical competence. Typical areas where management involvement was evident are in meeting the requirements for single loop operation, environmental qualification and responses to NUREG-0737. As a result there is relatively small backlog of multi-plant items. For most of the multi-plant items and NUREG-0737 items that are open the licensee has responded and is waiting for the NRC to complete its review.

## 2. Approach to Resolution of Technical Issues

The overall rating for this attribute is Category 2 with the performance ratings for the individual licensing actions generally falling into Category 1 or 2. The average ratings for the sub-divisions of this category were as follows:

- Understanding of Issues-2
- Conservatism of Resolution-2
- Acceptability of Approach-2
- Technical Soundness of Approach-2

The licensee often demonstrates an awareness of existing as well as pending requirements. Although CNS has a small technical staff relative to most utilities, this is augmented with contracted technical services when needed. This combination adequately provides the needed technical expertise to respond to the staffs requests and requirements. While the overall average of the reviewers for this Category was 2 as Project Manager, I would rate NPPD higher but not sufficiently so to warrant a Category 1 rating.

## 3. Responsiveness to NRC Initiatives

The overall rating for this attribute is Category 1 with the performance ratings for the individual licensing actions all falling into Category 1 or 2. The average ratings for the sub-divisions of this category were as follows:

- Meeting of Deadlines-1
- Timeliness of Resolution 1-2
- Acceptability of Resolutions-2
- Cooperativeness-1

NPPD is cooperative and responsive to the staffs requests for information and in complying to the staffs requirements. They have a well programmed computerized system for keeping track of dates, responses, and when submittals are due. There are very few items outstanding for significant periods of time. The resolutions proposed are usually acceptable with little or no modifications required.

## V. Conclusions

Based on the evaluation of the three attributes of NPPD performance for a number of significant activities in the functional area of licensing an overall performance rating of Category 1 has been determined. Specifically, management attention and involvement with matters of nuclear safety is evident, licensee resources are adequate though the utilization of contracted services, and good performance with respect to operational safety is being achieved. The licensee's responses are timely, deadlines are almost always met, and the proposed resolution to licensing issues are reasonably responsive.

**INSPECTOR'S REPORT**  
Office of Inspection and Enforcement

DuBois, Dennis L.  
REVIEWER  
Madsen, Glen L.

INSPECTORS  
J. J. Gagliardo, Director, DRRP & EP  
G. L. Madsen, Chief, RPB-1  
B. L. Siegel, Licensing PM, NRR  
T. F. Westerman, Chief, RPS-1

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT NO.	SEQ.	MO.	YR.	NEXT INSP. DATE
Nebraska Public Power District P.O. Box 499 Columbus, Nebraska 68601	X I - INSERT M - MODIFY D - DELETE R - REPLACE	05000298	82	24			

PERIOD OF INVESTIGATION/INSPECTION	INSPECTION PERFORMED BY	ORGANIZATION (CODE OF REGION/HQ CONDUCTING ACTIVITY)
FROM: MO. 08, DAY 31, YR. 182 TO: MO. 08, DAY 31, YR. 182	X 1 - REGIONAL OFFICE STAFF 2 - RESIDENT INSPECTOR 3 - PERFORMANCE APPRAISAL TEAM	REGION 4, DIVISION C, BRANCH A

REGIONAL ACTION (Check one box only)	TYPE OF ACTIVITY CONDUCTED (Check one box only)
X 1 - NRC FORM 581 2 - REGIONAL OFFICE LETTER	X 02 - SAFETY 03 - INCIDENT 04 - ENFORCEMENT 05 - MGMT. AUDIT 06 - MGMT. VISIT 07 - SPECIAL 08 - VENDOR 09 - MAT. ACCT. 10 - PLANT SEC. 11 - INVENT. VER. 12 - SHIPMENT/EXPORT 13 - IMPORT 14 - INQUIRY 15 - INVESTIGATION

INSPECTION/INVESTIGATION FINDINGS (Check one box only)	TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS	ENFORCEMENT CONFERENCE HELD	REPORT CONTAIN 2,790 INFORMATION	LETTER OF REPORT TRANSMITTAL DATE
X 1 - CLEAR 2 - VIOLATION 3 - DEVIATION 4 - VIOLATION & DEVIATION	A B C D	A B C D 1 - YES	A B C D 1 - YES	SEP 24 1982 MO. 09, DAY 24, YR. 1982

MODULE INFORMATION										MODULE INFORMATION																			
REC. ORD.	MODULE NUMBER INSP.					PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP					REC. ORD.	MODULE NUMBER INSP.					PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ. FOLLOWUP				
TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL					TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER					LEVEL	TYPE	NUMBER	PHASE	MANUAL CHAPTER
B	59				021	B	A	199	100	C	B							A											