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MEMORANDUM TO: ALL SET MEMBERS

7
9/22/94

FROM: Alan Madison

SUBJECT: STRAWMAN MEETING

Saturday, October 1, 1994 at 1pm, the team is scheduled for a "strawman" root cause meeting. The purpose of this meeting is to identify potential upper level causes of problems at CNS based on issues and facts identified to date. This is not meant as a final or complete compilation of causes and root causes. Rather, this meeting is a beginning and a start to the process.

You should come to this meeting prepared to **propose** causes and **discuss** facts which support these causes. All team members are asked to actively participate. The following agenda and ground rules will be used to facilitate discussions and ensure efficient and effective utilization of team time.

A. Brainstorming Session (20 min)

1. Each team member will be asked in turn to identify a potential cause. This will continue until no additional causes are identified or time has expired.
2. No criticism of causes is allowed.
3. One speaker at a time. Do not interrupt.

B. Discussion and Validation Session (1 hr)

1. Each identified cause will be discussed in turn.
2. Factual information will be solicited to support each cause.
 - a) The originator of the cause will be asked to respond first. Please, do not interrupt.
 - b) The discussion will then be opened to all team members.
3. Factual information may support multiple causes.
4. Causes may be deleted or combined.
5. All speakers should strive to be concise.

C. Summary and Review (10 min)

1. All team members will independently review the documented causes and factual information for completeness and accuracy. (5 min)

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2. Each team member will be asked in turn to concur or provide clarification. (5 min)

D. Critique (10 min)

1. Each team member will be asked to comment regarding how well we complied with the ground rules and how effective these rules were.
2. Applicability to the final root cause session on October 13 will be discussed.

E. SET Resource Allocation for Week 2 (30 min)

1. This portion of our meeting will be led by Ellis Merschoff.
2. Each team leader will be asked to discuss functional area evaluation plans for the coming week.
3. Adjustments will be discussed and agreed on.

I will be the facilitator for these discussions and will attempt to keep us all focused and in compliance with our ground rules. Russ Brown will act as recorder during the meeting, writing each cause on a separate sheet of easel paper, and later, each supporting fact. Ola West will be our timekeeper and will document our results for distribution to the team.

**UNITED STATES
NUCLEAR REGULATORY
COMMISSION**

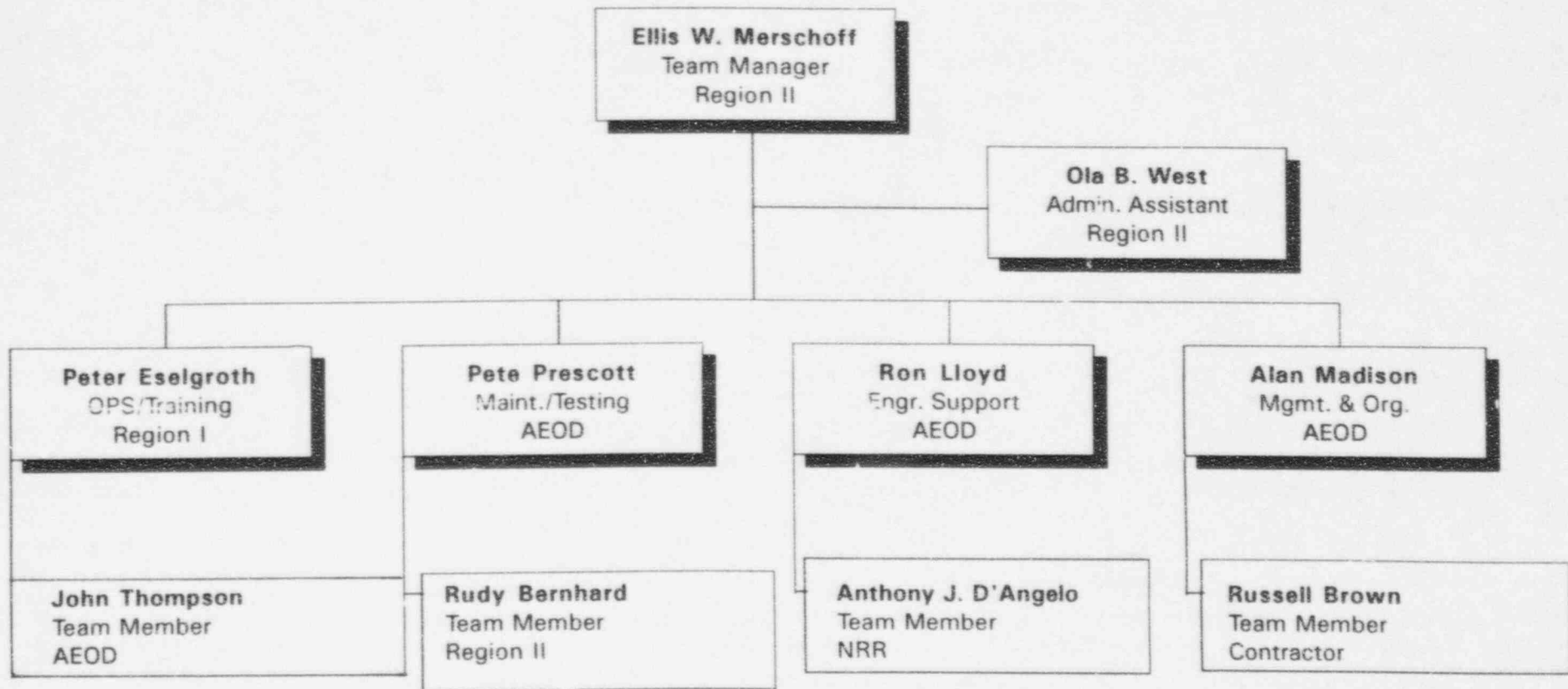


**NUCLEAR REGULATORY COMMISSION
COOPER NUCLEAR STATION
SPECIAL EVALUATION TEAM
FALL 1994**

**ELLIS W. MERSCHOFF
TEAM MANAGER**

D/1

Cooper Station Special Evaluation Team



MISSION OF COOPER SPECIAL EVALUATION TEAM

- 1. Conduct a thorough review of NRC data and information and licensee records to develop a preliminary assessment of Cooper Nuclear Station's safety performance and contributing causes for performance problems.**
- 2. Review Cooper Nuclear Station's Diagnostic Self Assessment (DSA) plans, observe selected activities of the DSA and review DSA documented results to develop a preliminary assessment of the quality, completeness, and independence of the DSA evaluation including appropriateness and completeness of the recommended corrective actions.**
- 3. To the extent necessary, conduct a followup onsite evaluation to independently assess the DSA's findings and conclusions and pursue potential significant safety performance problems and causes which may not have been sufficiently evaluated by the DSA.**
- 4. Develop findings and conclusions on the quality, completeness and independence of the DSA, and Cooper Nuclear Station's safety performance and root causes for performance problems.**
- 5. Document the results of NRC's special evaluation of the Cooper Nuclear Station DSA including any supplemental significant findings and conclusions developed independently by the NRC.**

COOPER SPECIAL EVALUATION TEAM SCHEDULE

July 25 - AUG 19	DSA field work (R. Beedle)
Aug 8 - 9	NRC SE Bagman (E. Merschoff and Team Leaders)
Aug 15-19	NRC SE Onsite Review/Assessment of DSA (E. Merschoff and Team Leaders)
Aug 23	Brief EDO on results of field work
Aug 22 - Sept 23	NRC SE review Cooper Performance Data/Develop Preliminary Assessment (Full NRC SE Team)
Sept 2	DSA report issued (R. Beedle)
→ Sept 14	Brief EDO on areas of concern
Sept 26-Oct 7	NRC SE onsite, as necessary, to sample DSA results and pursue potential performance deficiencies not addressed in DSA (full NRC SE Team)
Oct 12	Brief EDO on results on field work
Oct 9- Nov 30	NRC SE develop findings and conclusions (Full NRC SE Team)
Nov 10	Brief EDO on findings and conclusions
Nov 17	NRC SE/DSA Public Exit Meeting (E. Merschoff/R. Beedle)
Nov 30	Issue NRC SE Report (E. Merschoff)
Dec 9	Forward proposed Staff Actions

SET REPORT FORMAT/INSPECTION PLAN

EXECUTIVE SUMMARY

1.0 INTRODUCTION

BACKGROUND
SCOPE AND OBJECTIVES
METHODOLOGY

2.0 SE RESULTS

2.1 OPERATIONS AND TESTING

2.1.1 OPERATIONS HAS FAILED TO ADOPT A CONSERVATIVE OPERATING PHILOSOPHY RELATIVE TO TECHNICAL SPECIFICATION AND PROCEDURAL COMPLIANCE.

DSA EXAMPLE-CONFIRM IN FIELD
EXAMPLE FROM REVIEW OF PREP MATERIAL-CONFIRM
EXAMPLE...
EXAMPLE...

2.1.2 TESTING PROGRAMS HAVE, IN SOME INSTANCES, FAILED TO ASSURE THE FUNCTIONALITY OF SAFETY RELATED SYSTEMS AND COMPONENTS.

NRC EXAMPLE FROM PREP WORK-CONFIRM ON SITE
NRC EXAMPLE FROM PREP WORK-CONFIRM ON SITE
DSA EXAMPLE-CONFIRM ON SITE

2.2 MAINTENANCE

2.2.1 THE WORK CONTROL PROGRAM IS INEFFECTIVE AT ASSURING WORK IS PROPERLY PRIORITIZED, PLANNED, SCHEDULED, AND ACCOMPLISHED.

EXAMPLE...
EXAMPLE...
EXAMPLE...
EXAMPLE...

2.2.2 THE CORRECTIVE ACTION PROGRAM RESPONSIBILITY IS FRAGMENTED, LACKS RIGOR, OWNERSHIP, AND ACCOUNTABILITY.

2.3 ENGINEERING

2.3.1 THE DESIGN IS NOT ADEQUATELY CONTROLLED.

NRC EXAMPLE...
NRC EXAMPLE...
NRC EXAMPLE...

EXAMPLE REPORT WRITEUP:

The SET found limited use and understanding of the design basis by both Corporate and site engineering, as evidenced by ... (fully develop three or four good examples)

The licensee's recent self assessment in this area was in general agreement with these findings.

2.3.2 THE USE OF INDUSTRY OPERATING EXPERIENCE IS INEFFECTIVE IN ASSURING INDUSTRY LESSONS ARE LEARNED AND ACTED ON.

DSA EXAMPLE...

DSA EXAMPLE...

DSA EXAMPLE...

EXAMPLE REPORT WRITEUP:

The licensee's DSA noted significant deficiencies in the identification, review, and corrective action process associated with industry operating experience. Specifically, the review of ... (use DSA examples which were validated by the SET)

2.4 MANAGEMENT AND ORGANIZATION

2.4.1 INDEPENDENT OVERSIGHT ACTIVITIES HAVE FAILED TO IDENTIFY SIGNIFICANT WEAKNESSES IN THE MANAGEMENT OF COOPER NUCLEAR STATION.

2.4.2 SELF ASSESSMENT ACTIVITIES LACK A SELF CRITICAL APPROACH AND STRONG MANAGEMENT SUPPORT.

3.0 ROOT CAUSES

4.0 EVALUATION OF THE NPPD DSA
PROCESS
SCOPE
QUALITY
RESULTS

5.0 EXIT MEETING



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

MEMORANDUM TO: Arthur B. Beach, Director
Division of Reactor Projects
Region IV

FROM: Ellis W. Merschoff, Manager
Cooper Special Evaluation Team

SUBJECT: POTENTIAL RESTART ISSUES FOR COOPER NUCLEAR STATION

We have reviewed the specific findings of the Cooper Special Evaluation Team, and have developed the following list of issues which should be considered when you develop your list of actions required for restart. I recognize that some of these items may have already been addressed, and others may not need to be considered further based on additional information developed subsequent to the SET on site period. If you have any questions, please don't hesitate to call.

Potential Cooper Nuclear Station startup issues:

1. During 3/94 NOUE, incorrect information provided to the NRC resulted in very restrictive guidance to operators. (OPS - 4PE)
2. CNS failed to act on relevant industry operating experience - (OPS - 1JT)
3. Operations procedure change backlog 300 and increasing - (M&O - 15)
4. Inadequate EDG missile shield - (Eng - 62)
5. HPCI overspeed preconditioned - (RHB-25)
6. Nine safety related pumps in alert range IST - (Eng-26)
7. River Bottom doesn't meet FSAR - (Eng-16)
8. Vender Tech manuals (69) not evaluated for PMS - (Eng 29)
9. EDG injector torque requirements not followed - (PJP7)
10. Three control room supervisors were unaware of Special Order/Standby PTM for core spray (OPS - 8PE)
11. Inadequate surveillance procedures:
 - RHR logic - (Eng 66)
 - EDG 24 hours run - (PJP14)
 - RHR flow (DP issue) - (Eng 65)

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- 12. Inadequate performance of surveillance tests:
 - Core spray vibration - (Eng 17)
 - Relay position change verification - (RHB-17)
 - Preconditioning - (OPS-17 JT & RHB-25)
- 13. Material Condition:
 - Unrestrained Cranes & Chainfalls (RHB - 12)
- 14. PM Weakness:
 - No EDG 10 year tear down - (PJP - 4)
- 15. EDG air control valve procedure inadequate - (PJP - 14)
- 16. Valves not in valve lineup procedure - (Eng - 39)
- 17. Safety/Non Safety SW isolation valves not tested. Pressure actuation switch is flushed but not tested - (Eng - 46)
- 18. Torus Coating:
 - Never recoated
 - Schedule '93 - Deferred to 95 & perhaps further
 - General corrosion/some pitting up to .060"
- 19. Logic Testing
 - Doesn't meet Tech Specs for RHR (information provided separately)

In addition, the DSA left detailed formal notes for the licensee's use which provide substantially more detail than the DSA report. These notes, and the DSA report should be screened for startup issues.

Attachment: Referenced SEO's

Distribution:

EJordan, AEOD w/att
 FCongel, AEOD w/att
 SRubin, AEOD w/att

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NAME	EMerschhoff		RLloyd		PPrescott		PEselgroth		AMadison	
DATE	10/ /94		10/ /94		10/ /94		10/ /94		10/ /94	

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12. Inadequate performance of surveillance tests:
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INTERVIEW SCHEDULE

PETER PRESCOTT

MONDAY - 9:00 - 12:00	INTERVIEW WITH EDG SYSTEM ENGINEER AND SYSTEM WALKDOWN ENGINEER
MONDAY - 12:00 1:00	INTERVIEW WITH MAINTENANCE MANAGER
TUESDAY - 9:00 - 12:00	INTERVIEW WITH RHR SYSTEM ENGINEER AND SYSTEM WALKDOWN ENGINEER

INTERVIEW SCHEDULE

RUDY BERNHARD

MONDAY - 12:00 - 3:00	INTERVIEW WITH HPCI SYSTEM ENGINEERING AND SYSTEM WALKDOWN ENGINEER
TUESDAY - 9:00 - 12:00	INTERVIEW WITH RHR SYSTEM ENGINEER *NOTE: THIS WILL BE DONE WITH P. PRESCOTT
TUESDAY - 12:00 - 12:30	INTERVIEW WITH I&C PERSONNEL
TUESDAY - 12:30 - 1:00	INTERVIEW WITH I&C FOREMAN
TUESDAY - 1:00 - 1:30	INTERVIEW WITH I&C SUPERVISOR
TUESDAY - 1:30 - 2:00	INTERVIEW WITH MECHANIC
TUESDAY - 2:00 - 2:30	INTERVIEW WITH MECHANICAL CREW LEADERS

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- (1) Please provide the electronic file which contains all of the DSA Evaluator's forms for documenting their potential concerns/observations identified during the Self Assessment Process.
 - (2) Please provide the licensee's formal response to the DSA Evaluator's concerns/observations documented on the subject forms requested in item NO.1
 - (3) Please make available for review (on site during the scheduled NRC Bagman Trip) all DSA Evaluator's interview forms developed during the Self Assessment Process.

Questions for 10:00 a.m. Conference Call

- (1) Compared to similar evaluations you have performed, how would you rate this licensee's response/performance to the DSA?
- (2) Which areas/ disciplines (if any) were slow in responding to your request ?
- (3) Does the licensee plan on using the same individuals as Functional Area Interfaces for the NRC Special Evaluation ?
- (4) How significantly do you feel these Evaluations are impacting the licensee's restart effort etc. ?

D/4



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

Docket No. 50-298

Nebraska Public Power District
ATTN: Ronald W. Watkins, President
and Chief Executive Officer
P.O. Box 499
Columbus, Nebraska 68601

Dear Mr. Watkins:

This letter is to inform you of our plans to consider a Diagnostic Evaluation of Cooper Nuclear Station and review your ongoing self-assessment efforts. During discussions with Messrs. Horn and Meacham by Messrs. Callan and Jordan on June 23, 1994, we informed you of our plans to consider a Diagnostic Evaluation of Cooper Nuclear Station. The purpose of the evaluation would be to provide an independent assessment of the performance of the Nebraska Public Power District (NPPD) at Cooper, and to supplement information from the Systematic Assessment of Licensee Performance (SALP) and Performance Indicator (PI) programs, and other assessment data. Based on subsequent discussions via telephone on July 22 and 25, 1994, we understand that you are pursuing your own independent evaluation, utilizing utility and contract personnel, designed to emulate a Nuclear Regulatory Commission (NRC) Diagnostic Evaluation. Concurrently, NRC has been pursuing innovative methods to ascertain the status of Cooper Nuclear Station while remaining sensitive to current resource limitations. Your proposed independent evaluation and self-assessment appear to provide such an opportunity. Consequently, I have directed that: 1) a Diagnostic Evaluation Team consisting of NRC Headquarters and Regional evaluators and NRC contractors be formulated, with oversight and support provided by the Office for Analysis and Evaluation of Operational Data (AEOD), 2) this Team will conduct an independent evaluation of data and information available in NRC records and review records collected during a brief visit to Cooper Station in August, 1994, 3) the Team will also independently observe selected activities of the Cooper Nuclear Station's independent evaluation team during August, 1994, and review all plans, records, and reports associated with this effort, and 4) the Team will evaluate the adequacy and independence of the Cooper Nuclear Station's evaluation and recommend whether further NRC inspection or evaluation is necessary. Particular emphasis will be placed on the scrutability and thoroughness of the Cooper Nuclear Station's process. NRC must have confidence that the evaluation is equivalent to a NRC Diagnostic Evaluation in analyzing both technical and managerial/organizational issues. Based on findings of the NRC evaluation, I will make a decision on whether to proceed with a full Diagnostic Evaluation during September-October 1994 time frame at Cooper and NPPD's corporate offices. All documents associated with this review, including plans and reports generated by your independent evaluation team and the recommendations of the NRC Team, will become part of the public record.

D/S



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

Additional information will be provided in future communications with your staff by Region IV and AEOD. Representatives of the Diagnostic Evaluation Team plan to be onsite during the week of August 1, 1994 to provide further information on the purpose, process, and plans for this evaluation and the possible Diagnostic Evaluation, make preliminary logistic and administrative arrangements, and request key station and corporate documents.

Mr. Watkins

- 2 -

The AEOD contact responsible for the Diagnostic Evaluation Program is Mr. E. L. Jordan, Director, EOD (301-415-7472). Please contact Mr. Jordan or me if you have any questions concerning this matter.

Sincerely,

James M. Taylor
Executive Director
for Operations

cc: See Page 3

Mr. Watkins

- 2 -

The AEOD contact responsible for the Diagnostic Evaluation Program is Mr. E. L. Jordan, Director, AEOD (301-415-7472). Please contact Mr. Jordan or me if you have any questions concerning this matter.

Sincerely,

James M. Taylor
Executive Director
for Operations

cc: See Page 3

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cc:

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Nebraska Public Power District
Cooper Nuclear Station

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Nebraska Public Power District
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

Docket No. 50-298

Nebraska Public Power District
ATTN: Ronald W. Watkins, President
and Chief Executive Officer
P.O. Box 499
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Additional information will be provided in future communications with your staff by Region IV and AEOD. Representatives of the special Evaluation Team

D/6

Mr. Watkins

- 2 -

plan to be onsite during the week of August 1, 1994 to provide further information on the purpose, process, and plans for this evaluation, make preliminary logistic and administrative arrangements, and request key station and corporate documents.

The AEOD contact responsible for the Special Evaluation is Mr. E. L. Jordan, Director, AEOD (301-415-7472). The team leader is Mr. Ellis Merschoff (301-415-6954). Please contact Mr. Jordan or me if you have any questions concerning this matter.

Sincerely,

James M. Taylor
Executive Director
for Operations

cc: See Page 3

Mr. Watkins

- 2 -

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Sincerely,

James M. Taylor
Executive Director
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cc: See Page 3

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Mr. Guy R. Horn
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Cooper Nuclear Station

Self-Assessments

DET Issues	Enercon	EIIT and CAP	Common Cause	Staffing		DSA
▲ 7/92	▲ 1/93	▲ 8/93	▲ 10/93 11/93	▲ 1/94		▲ 5/94 6/94 8/94 9/94
			▼			▼ ▼ ▼
			SPPI			IEP BP PIP

Corrective Action Plans

8/15