

APR - 7 1992

Docket No. 50-298
License No. DPR-46

Nebraska Public Power District
ATTN: Guy R. Horn, Nuclear Power
Group Manager
P.O. Box 499
Columbus, Nebraska 68602-0499

Gentlemen:

SUBJECT: FINAL SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT
NO. 50-298, 2-99

This forwards the final SALP report for the Cooper Nuclear Station (CNS) for the period of July 16, 1990, through January 18, 1992. This final SALP report includes:

1. The cover letter for the initial SALP report (no revisions to the initial report were made).
2. A summary and list of attendees at our March 24, 1992, meeting at CNS security auditorium.

On April 6, 1992, it was confirmed by Mr. G. R. Smith, Nuclear Licensing and Safety Manager, that the Nebraska Public Power District did not elect to respond to the initial SALP report.

The next SALP period for the FCS is scheduled to last 15 months, from January 19, 1992, through April 24, 1993.

Sincerely,

ORIGINAL SIGNED BY
ROBERT D. MARTIN
Robert D. Martin
Regional Administrator

Enclosures:

1. Cover letter for the initial SALP report
2. Meeting Summary and Attendance List

cc: (see next page)

RIV:DRB/C
PHHarrell
4/7/92

NRR
DWigginton
4/7/92

D:DRSS
LJCallan
4/7/92

D:DRS
SJCcollins
4/7/92

D:DAP
ABBeach
4/7/92

DRA
JMMontgomery
4/7/92

R/D
RDMartin
4/7/92

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PDR ADDCK 0500029B
PDR

IE40

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: 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

Kansas Radiation Control Program Director

bcc to DMB (IE40)

bcc distrib. by RIV:
R. D. Martin
Section Chief (DRP/C)
DRSS-RPEPS
RIV File
RSTS Operator
Senior Resident Inspector - River Bend
Senior Resident Inspector - Fort Calhoun
The Chairman (MS: 16-G-15)
Commissioner Rogers (MS: 16-G-15)
Commissioner Curtiss (MS: 16-G-15)
Commissioner Remick (MS: 16-G-15)
Commissioner de Planque (MS: 16-G-15)
J. M. Taylor, EDO (MS: 17-G-21)
J. M. Montgomery
J. T. Gilliland, PAO
C. A. Hackney

Resident Inspector
Lisa Shea, RM/ALF
MIS System
Project Engineer (DRP/C)
DRP (2)
DRS
Chief, DRP/TSS
Records Center, INPO
G. F. Sanborn, EO
DRP (2)
RRIs at all sites
L. J. Callan, D:DRSS
J. P. Jaudon, DRSS
B. Murray, DRSS
C. L. Cain, DRSS

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Nebraska Public Power District

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UNITED STATES
 NUCLEAR REGULATORY COMMISSION

REGION IV
 811 RYAN PLAZA DRIVE, SUITE 1000
 ARLINGTON, TEXAS 76011

MAR 16 1992

Doc No. 50-298
 License No. DPR-46

Nebraska Public Power District
 ATTN: Guy R. Horn, Nuclear Power
 Group Manager
 P.O. Box 499
 Columbus, Nebraska 68602-0499

Gentlemen:

SUBJECT: INITIAL SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT

This forwards the initial SALP Report (50-298/92-99) for the Cooper Nuclear Station. The SALP Board met on February 20, 1992, to evaluate the performance for the period July 16, 1990, through January 18, 1992. The performance analyses and resulting evaluations are documented in the enclosed initial SALP report.

In accordance with NRC policy, I have reviewed the SALP Board's assessment and concur with their ratings, as discussed below:

The performance in the functional area of Plant Operations was rated as a Performance Category 2, which represents a decline from the previous rating of 1. Performance of the operating staff was excellent during routine, day-to-day activities. However, significant concerns with the ability of the operators to display command, control, and communications during response to simulated emergency conditions were identified.

The functional area of Radiological Controls was rated as a Performance Category 2. This rating represents a decline from the previous rating of 1. Performance of the radiological protection staff was excellent during routine day-to-day activities. The decrease in performance rating was based on concerns identified with implementation of radiological control programs during the refueling outage. The types of problems identified indicated poor communications, coordination, and controls among plant radiological protection personnel, contractor radiological protection personnel, and radiation workers.

The functional area of Maintenance/Surveillance was rated as a Performance Category 1, compared to a previous rating of 2. The increase in the performance rating was attributed to increased management involvement in this functional area and the excellent performance of the licensee's staff involved in maintenance and surveillance activities.

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- ° Performance in the area of Emergency Preparedness was rated as a Performance Category 2. The rating was based on the types of weaknesses identified during emergency exercises, and in walkthroughs with control room operators where weak performance was demonstrated in emergency plan implementation.
- ° The functional area of Security was rated as a Performance Category 1, an increase from the previous rating of 2. Management oversight and the performance of the security staff in this functional area were notable.
- ° The functional area of Engineering/Technical Support was rated as a Performance Category 2, with good performance noted overall. Management's inability to adequately address concerns identified in previous assessment periods with the licensed operator training program was a prime consideration in this rating.
- ° The functional area of Safety Assessment/Quality Verification was rated as a Performance Category 2. This rating was based on weaknesses identified with the licensee's corrective action program in that the threshold for issuance of nonconformance reports was too high to ensure that all potential deficient conditions were identified. The performance of the audit and oversight groups was good.

Overall, licensee performance was good with strengths and weaknesses noted. Strengths included management's oversight and involvement in the functional areas of Security and Maintenance/Surveillance. It was also noted that the performance of the personnel involved in implementation of the programs associated with these functional areas was superior.

Areas of performance requiring additional management attention and involvement include the licensed operator training program, performance of licensed operators during simulated emergency conditions, implementation of radiological protection programs, and the high threshold for documentation of deficiencies within the corrective action program.

On the basis of the SALP Board's assessment, the length of the SALP period will be approximately 15 months. Accordingly, the next SALP period will be from January 19, 1992, to April 24, 1993.

A management meeting has been scheduled with you and your staff at the Cooper Nuclear Station security building auditorium on March 24, 1992, at 10 a.m. to review the results of the SALP Board. Within 20 days of this management meeting, you may provide comments on and amplification of, as appropriate, the initial SALP report.

Your written comments, a summary of our meeting, and the results of my consideration of your comments will be issued as an appendix to the enclosed initial SALP report and will constitute the final SALP report.

Sincerely,



Robert D. Martin
Regional Administrator

Enclosure: Appendix - Initial SALP Report
50-298/92-99

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

Cooper Nuclear Station
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ATTN: Harold Borchert, Director
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301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509-5007

Kansas Radiation Control Program Director

ATTENDEES

(partial list)

<u>Name</u>	<u>Affiliation</u>
J. Montgomery	NRC - Region IV
D. Chamberlain	NRC - Region IV
A. Beach	NRC - Region IV
J. Jaudon	NRC - Region IV
P. Harrell	NRC - Region IV
R. Kopriva	NRC - Region IV
W. Walker	NRC - Region IV
S. Neddenriep	NRC - Region IV
J. Larkins	NRC - NRR
R. Bevan	NRC - NRR
H. Paris	NPPD
G. Horn	NPPD
J. Meacham	NPPD
R. Wilbur	NPPD
V. Wolstenholm	NPPD
D. Whitman	NPPD
G. Smith	NPPD
S. Peterson	NPPD
E. Mace	NPPD
J. Dutton	NPPD
R. Gardner	NPPD
J. Flaherty	NPPD

UNITED STATES
NUCLEAR REGULATORY
COMMISSION



SYSTEMATIC ASSESSMENT
OF
LICENSEE PERFORMANCE
(SALP)

NEBRASKA PUBLIC POWER DISTRICT

COOPER
NUCLEAR STATION

SALP PRESENTATION

JULY 16, 1990
THROUGH
JANUARY 18, 1992

BROWNVILLE, NE.

MARCH 24, 1992

INTRODUCTIONS

- o NUCLEAR REGULATORY COMMISSION
- o NEBRASKA PUBLIC POWER DISTRICT (NPPD)
- o INTERESTED PARTIES

AGENDA

OPENING REMARKS

JOHN M. MONTGOMERY

SALP PRESENTATION

A. BILL BEACH

CLOSING REMARKS

JOHN M. MONTGOMERY

COMMENTS AND/OR QUESTIONS

NPPD

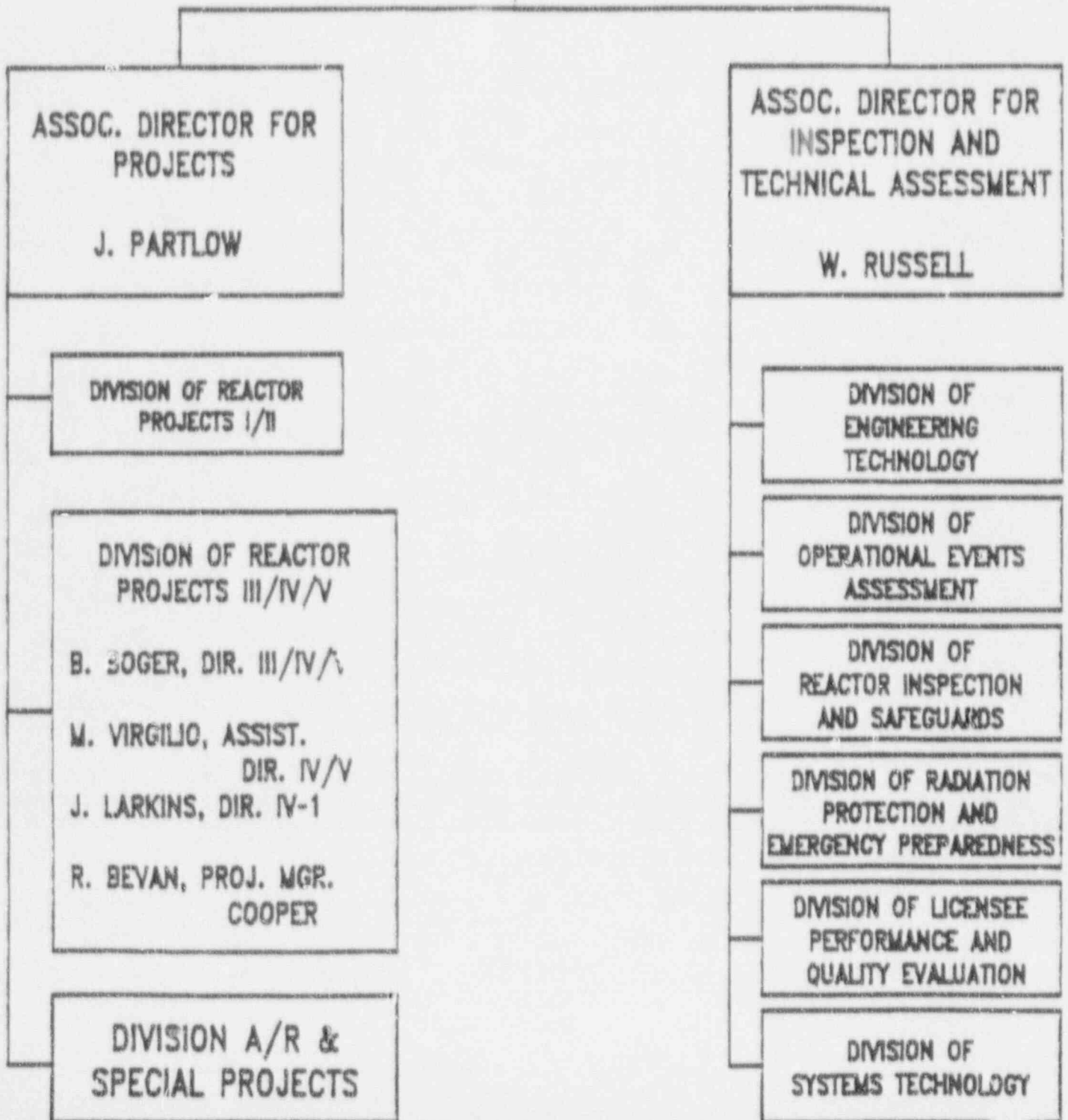
COMMENTS AND/OR QUESTIONS

PUBLIC/MEDIA

NRR ORGANIZATION

OFFICE OF
NUCLEAR REACTOR
REGULATION

DIR. T. MURLEY



REGION IV ORGANIZATION

OFFICE OF THE ADMINISTRATOR

ADMINISTRATOR R. MARTIN

DEPUTY J. MONTGOMERY

DIVISION OF
REACTOR PROJECTS

DIR. A. BEACH
DEPUTY P. GWYNN

DIVISION OF
REACTOR SAFETY

DIR. S. COLLINS
DEPUTY D. CHAMBERLAIN

DIVISION OF
RADIATION SAFETY
AND SAFEGUARDS

DIR. J. CALLAN
DEPUTY J. JAUDON

DIVISION OF REACTOR PROJECTS ORGANIZATION

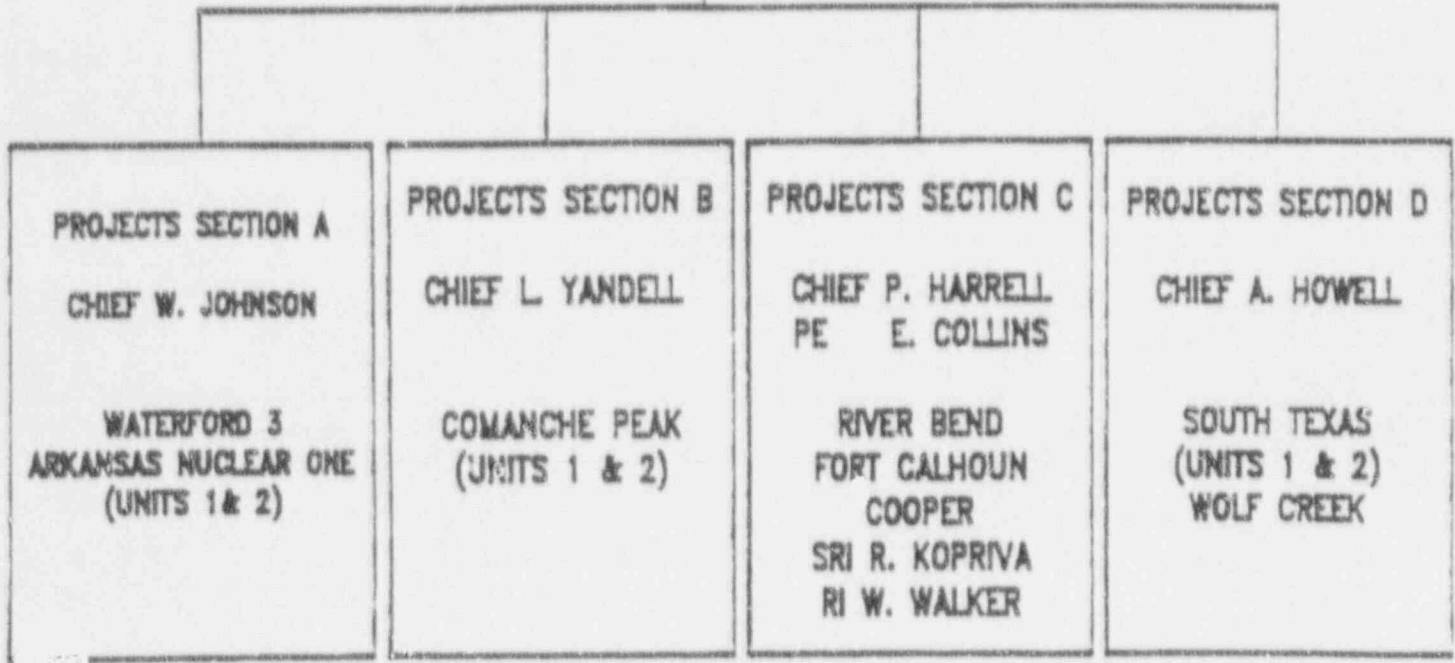
DIVISION OF
REACTOR PROJECTS

DIR. A.B. BEACH

DEPUTY T.P. GWYNN

TECHNICAL SUPPORT

CHIEF L. CONSTABLE



SALP PROGRAM OBJECTIVES

1. IDENTIFY TRENDS IN LICENSEE PERFORMANCE
2. PROVIDE A BASIS FOR ALLOCATION OF NRC RESOURCES
3. IMPROVE NRC REGULATORY PROGRAM

PERFORMANCE ANALYSIS AREAS

- A. PLANT OPERATIONS
- B. RADIOLOGICAL CONTROLS
- C. MAINTENANCE/SURVEILLANCE
- D. EMERGENCY PREPAREDNESS
- E. SECURITY
- F. ENGINEERING/TECHNICAL SUPPORT
- G. SAFETY ASSESSMENT/QUALITY VERIFICATION

**EVALUATION
CRITERIA**

Assurance of Quality

Approach to the Resolution of
Technical Issues from a Safety
Standpoint

Enforcement History

Operational and Construction
Events

Staffing

Effectiveness of Training
and Qualifications

Category Rating

Plant Operations							
Radiological Controls							
Maintenance/Surveillance							
Emergency Preparedness							
Security							
Engineering/Technical Support							
Safety Assessment/Quality Verification							

PERFORMANCE RATING

CATEGORY 1

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN A SUPERIOR LEVEL OF PERFORMANCE. NRC WILL CONSIDER REDUCED LEVELS OF INSPECTION EFFORT.

PERFORMANCE RATING

CATEGORY 2

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN A GOOD LEVEL OF PERFORMANCE. NRC WILL CONSIDER MAINTAINING NORMAL LEVELS OF INSPECTION EFFORT.

PERFORMANCE RATING

CATEGORY 3

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN AN ACCEPTABLE LEVEL OF PERFORMANCE; HOWEVER, BECAUSE OF THE NRC'S CONCERN THAT A DECREASE IN PERFORMANCE MAY APPROACH OR REACH AN UNACCEPTABLE LEVEL, NRC WILL CONSIDER INCREASED LEVELS OF INSPECTION EFFORT.

PERFORMANCE TREND

AN APPRAISAL OF A PERFORMANCE TREND IN A FUNCTIONAL AREA IS USED AS A PREDICTIVE INDICATOR, A PERFORMANCE TREND SHOULD ONLY BE USED IF BOTH A DEFINITE TREND IS DISCERNIBLE, EITHER IMPROVING OR DECLINING, AND CONTINUATION OF THE TREND MAY RESULT IN A CHANGE IN PERFORMANCE RATING.

IMPROVING TREND DEFINITION

PREVIOUS

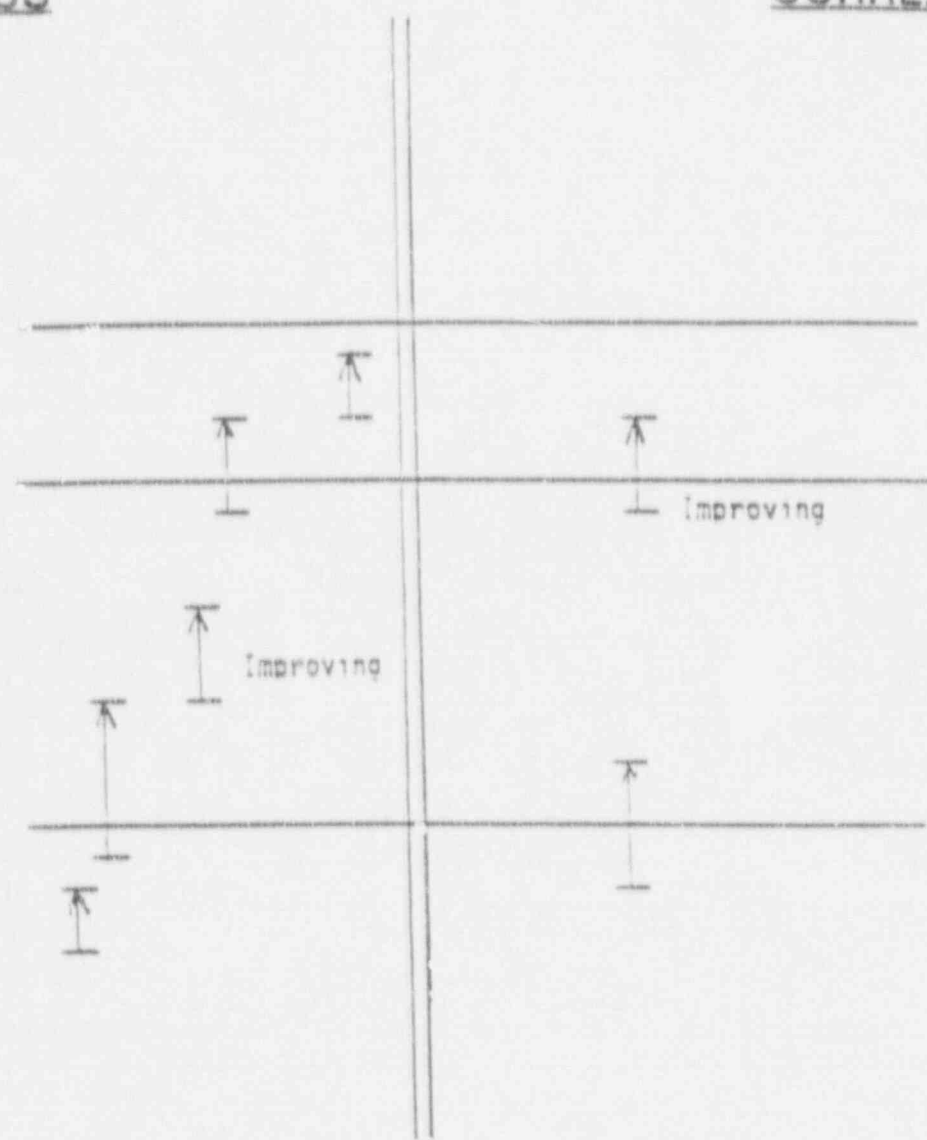
CURRENT

SALP
RATING

1

2

3



COOPER NUCLEAR STATION OVERALL PERFORMANCE SUMMARY

<u>FUNCTIONAL AREA</u>	<u>RATING LAST</u> <u>PERIOD</u> 4/16/89 - 7/15/90	<u>RATING THIS</u> <u>PERIOD</u> 7/16/90 - 1/18/92
PLANT OPERATIONS	1	2
RADIOLOGICAL CONTROLS	1	2
MAINTENANCE/SURVEILLANCE	2 (IMPROVING)-	1
EMERGENCY PREPAREDNESS	2 (IMPROVING)-	2
SECURITY	2 (IMPROVING)-	1
ENGINEERING/TECHNICAL SUPPORT	2	2
SAFETY ASSESSMENT/ QUALITY VERIFICATION	2	2

* Previous Definition

PLANT OPERATIONS

SALP CATEGORY 2

- + MANAGEMENT ATTENTION AND OVERSIGHT USUALLY CONSERVATIVE
- + PERFORMANCE DURING ROUTINE DAY-TO-DAY PLANT OPERATION - EXCELLENT
- + EXPERIENCED AND KNOWLEDGEABLE LICENSED OPERATORS
- + NO MAJOR PLANT CHALLENGES OCCURRED
- + INTRAORGANIZATIONAL COMMUNICATIONS - NOTABLE
- + HOUSEKEEPING - EXCELLENT
- o PROCEDURES GENERALLY GOOD
- o SOME LACK OF ATTENTION-TO-DETAIL IN THE USE OF PROCEDURES
- o EFFECTIVE IN USING THE SIMULATOR FOR TRAINING
- MANAGEMENT EXPECTATIONS NOT CLEARLY EXPRESSED
- WEAKNESSES EVIDENT DURING SIMULATED EMERGENCIES IN COMMAND, CONTROL AND COMMUNICATIONS WHEN OPERATORS STRESSED
- APPARENT LACK OF DIAGNOSTIC SKILLS BY OPERATORS

RADIOLOGICAL CONTROLS

SALP CATEGORY 2

- + ROUTINE DAY-TO-DAY PERFORMANCE OF RADIATION PROTECTION STAFF - EXCELLENT
- + STRONG MANAGEMENT COMMITMENT TO ALARA
- + QA AUDITS USED TECHNICAL EXPERTS - COMPREHENSIVE
- + EXPOSURES BELOW NATIONAL AVERAGE
- + EXCELLENT GET AND ADVANCED RADIATION WORKER TRAINING
- + CHEMISTRY AND EFFLUENTS PROGRAMS - EXCELLENT
- + SOLID RADWASTE AND TRANSPORTATION PROGRAMS - EXCELLENT
- o IMPROVEMENTS IN RADIATION PROTECTION TRAINING
- RADIOLOGICAL PROTECTION PROGRAM WEAKNESSES - DURING THE STRESSFUL OUTAGE PERIOD - DUE TO POOR COMMUNICATIONS, COORDINATION AND CONTROL
- SPECIAL WORK PERMIT PROGRAM WEAKNESSES
- LIMITED ALARA GROUP INVOLVEMENT DURING OUTAGE
- MARGINAL RESOURCES IN OUTAGE

MAINTENANCE/SURVEILLANCE

SALP CATEGORY 1

- + PERFORMANCE OF MAINTENANCE ACTIVITIES - SUPERIOR
- + SURVEILLANCE PROGRAM - STRENGTH
- + INTERNAL COMMUNICATIONS - SUPERIOR
- + MATERIAL CONDITION - VERY GOOD
- + POSTMAINTENANCE TESTING IMPROVED
- o IMPROVED MAINTENANCE PROCEDURES
- o PREDICTIVE MAINTENANCE PROGRAM DEVELOPED
- o PEER QUALITY CONTROL PROGRAM EFFECTIVE
- CONTROLS FOR CLEANLINESS DURING SAFETY RELATED MAINTENANCE-WEAKNESS

EMERGENCY PREPAREDNESS

SALP CATEGORY 2

- + USE OF SIMULATOR IN THE DYNAMIC MODE ADDED REALISM TO EXERCISES
- + EXCELLENT MANAGEMENT SUPPORT
- + PROACTIVE AND RESPONSIVE TO WEAKNESSES
- + EFFECTIVE QA AUDITS
- IMPROVED AND CHALLENGING EMERGENCY EXERCISES
- GOOD LEVEL OF OPERATIONAL READINESS
- IMPROVEMENTS NOTED REGARDING EMERGENCY PLAN CHANGES
- WEAKNESSES WERE IDENTIFIED IN THE ABILITY OF THE CONTROL ROOM OPERATORS TO IMPLEMENT THE EMERGENCY PLAN DURING STRESSFUL SITUATIONS

SECURITY

SALP CATEGORY 1

- + SECURITY PROGRAM - SUPERIOR
- + PROFESSIONAL SECURITY STAFF
- + STAFFING, TRAINING, SECURITY SYSTEMS AND SECURITY MANAGEMENT - OUTSTANDING
- + STRONG MANAGEMENT SUPPORT
- + SIGNIFICANT IMPROVEMENT IN SECURITY IMPLEMENTATION DURING THE OUTAGE
- + QA AUDITS EXCELLENT
- + RESPONSIVENESS TO AUDIT FINDINGS - EXCELLENT

ENGINEERING / TECHNICAL SUPPORT

SALP CATEGORY 2

- + EDSFI IDENTIFIED MANY STRENGTHS AND FEW WEAKNESSES
- + INTERDEPARTMENTAL COMMUNICATIONS - SUPERIOR
- + IMPROVEMENTS SEEN IN MAINTENANCE TRAINING
- + TRAINING STAFF INCREASED
- o SYSTEMS ENGINEERING PROGRAM - GENERALLY EFFECTIVE
- o CONTROL OF OUTAGE ACTIVITIES SATISFACTORY
- o POSTMAINTENANCE TESTING PROGRAM GOOD
- CONCERNS CONTINUE TO EXIST IN THE AREA OF LICENSED OPERATOR TRAINING

SAFETY ASSESSMENT/ QUALITY VERIFICATION

SALP CATEGORY 2

- + MANAGEMENT ASSURANCE OF QUALITY IN MAINTENANCE, MAINTENANCE TRAINING, SURVEILLANCE, AND SECURITY - EXCELLENT
- + EFFECTIVE SELF-ASSESSMENT
- OVERALL - GOOD ASSURANCE OF QUALITY
- MANAGEMENT ASSURANCE OF QUALITY IN RADIOLOGICAL CONTROLS, LICENSED OPERATOR TRAINING, AND OPERATOR PERFORMANCE IN THE SIMULATOR REQUIRES ADDITIONAL ATTENTION
- GOOD PROBLEM SOLUTION FROM A SAFETY PERSPECTIVE
- GOOD SAFETY ASSESSMENTS OF PROPOSED LICENSE ACTIONS
- 50.59 REVIEWS GOOD
- HIGH THRESHOLD FOR NONCONFORMANCE REPORTS
- NOT PROACTIVE IN IDENTIFYING POTENTIAL SAFETY ISSUES

EVALUATION CRITERIA	Assurance of Quality	Approach to the Resolution of Technical Issues from a Safety Standpoint	Enforcement History	Operational and Construction Events	Staffing	Effectiveness of Training and Qualifications	Category Rating
	Plant Operations		+	+		+	-
Radiological Controls		+	+				
Maintenance/Surveillance		+	+		+	+	+
Emergency Preparedness							
Security	+	+		+	+	+	+
Engineering/Technical Support			+				
Safety Assessment/Quality Verification			+				

* Improving

NEXT SALP PERIOD

- SCHEDULED JANUARY 19, 1992, THROUGH APRIL 24, 1993
- 15 MONTHS