



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS950239
December 16, 1995

Mr. L. J. Callan
Regional Administrator
U.S. NRC - Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

Subject: Response to the Systematic Assessment of Licensee Performance (SALP) Report

Reference: NRC Inspection Report 50-298/95-99

Dear Mr. Callan:

Inspection Report 50-298/95-99 for Cooper Nuclear Station (CNS) provided the NRC's assessment of safety performance at CNS for the period of April 25, 1993, through July 8, 1995. While this interval was significantly longer than the normal 18-month cycle, it allowed both NRC and Nebraska Public Power District (District) management to focus on the progress of the significant performance improvement plans underway at CNS. As a result, the strengths and weaknesses identified by the SALP report have been particularly helpful to the District in directing management attention and resources in our continuing efforts to improve. These ongoing efforts have been prioritized by the Performance Improvement Plan, an overall framework for improving CNS performance through the development and implementation of required programmatic and organizational infrastructure changes.

Within the Performance Improvement Plan, numerous strategies have been developed to reestablish Operations in a strong leadership role. This objective will be achieved by establishing uniform site priorities, setting standards for performance, and restructuring programs and processes to apply safe operating principles. This disciplined approach to operations will:

- Improve consistency between crews,
- Enhance accountability for operations staff outside the Control Room,
- Establish a challenging attitude toward operational concerns, and
- Serve as a catalyst for improved performance in support organizations.

Although many improvements have been made in Maintenance, this functional area continues to receive rigorous management involvement. Whereas the lessons learned from earlier preconditioning and surveillance testing issues have been communicated to station personnel, management expectations are being frequently reinforced. Further, while improvement has been seen in the quality and detail within maintenance procedures, the balance between skill of the craft and formalized maintenance practices and training has yet to be achieved. Notwithstanding

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these concerns, marked progress has been made through an improved work control process that integrates Operations and Maintenance work activities. The results to date include improved scheduling, improved pre-job briefs, and improved work packages and procedures. Continued betterment will be driven by the Performance Improvement Plan and by the lessons learned from the current refueling outage through the post-outage critique process.

Within Engineering, the reorganization has been completed and all key positions filled. Further, improved management oversight has resulted in more effective work prioritization and issue resolution. The effectiveness of these, and other actions taken to date, will be assessed during a comprehensive self-assessment currently scheduled for early 1996. The results of this self-assessment will be contrasted against the numerous improvements already targeted by the Performance Improvement Plan and changes made where required.

While the primary focus of management attention is directed to the functional areas of Operations, Maintenance, and Engineering, enhancements within the Plant Support area are also viewed as critical to the long term operation of CNS. For example, by establishing four independent emergency response teams, additional depth has been added to the Emergency Response Organization. Changes within Security have been made to centralize and better integrate the access screening and badging processes to enhance efficiency and eliminate miscommunications. Within the Radiological Protection Department, significant enhancements have been made with respect to RCA access monitoring, contamination survey practices, and the ALARA program. While many of these enhancements were not formally included in the Performance Improvement Plan, other actions to drive improvements within this functional area are and continue to receive management attention.

The District considers the independent oversight provided by the Quality Assurance organization to be an important function. Although significant improvement has been seen, additional actions are being taken to make the organization more intrusive and challenging to plant management. These actions, coupled with significant improvements within the corrective action and self-assessment programs, will ensure that problems are self-identified and solved in an environment that drives continuous improvement.

In summary, the District concurs with the underlying issues identified by the SALP report. Actions to address these issues are being orchestrated under the Performance Improvement Plan to ensure that improvement efforts are coordinated and support our vision and top level goals. Intrinsic in these goals is the District's firm commitment to achieving and sustaining higher levels of excellence in nuclear operations.

Sincerely,



John H. Mueller
Site Manager

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NLS950239
December 16, 1995
Page 3 of 3

cc: Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

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The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
None.	