Nebraska Public Power District

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April 9, 1985

Office of Inspection and Enforcement
Division of Quality Assurance, Safeguards,
and Inspection Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. J. Nelson Grace, Director

Subject: Response to Performance Appraisal Inspection 50-298/84-21

Reference:

1) Letter from J. N. Grace to J. M. Pilant dated February 1, 1985, "Performance Appraisal Inspection 50-298/84-21"

2) Letter from J. M. Pilant to E. H. Johnson dated January 29, 1985, "NPPD Response to NRC Inspection Report No. 50-298/84-20"

3) Letter from L. G. Kuncl to J. M. Taylor dated March 14, 1985, "Response to Notice of Violation and Proposed Imposition of Civil Penalty (NRC Inspection Report No. 50-298/84-26)

Dear Mr. Grace:

Reference 1 identified three Category Three areas (i.e., Plant Operations, Radiological Controls, and Training) among the nine management control areas evaluated during the Performance Appraisal Inspection and requested information concerning the actions Nebraska Public Power District has taken or plans to take to improve the management controls in those areas. In addition, NPPD was also requested to identify actions taken to improve procedures and to improve compliance with commitments made to the NRC.

In the area of Plant Operations, the PAT inspection identified weaknesses in the periodic operability verification of certain safety-related systems, the administrative control of certain plant systems and equipment, the system for controlling operating procedures, shift turnover checklists used by operators in the control room, and the program to control the use of overtime for key operations personnel.

In general, several actions have been taken as a result of this review to improve the management controls in the operations area. A review of the overall CNS management indicated that the operations manager was significantly overburdened with responsibilities. This position, which

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previously had responsibility for all plant operations, maintenance, and instrument and control activities, has been split into two positions. The positions of operations manager and maintenance manager are now in place. The existing operations manager position now has responsibility for plant operations and instrument and control activities. The new position of maintenance manager has responsibility for all maintenance activities. To provide further assistance to the operations manager, the position of assistant to the operations manager was created to alleviate part of the administrative burden. This provides more time to the operations manager for increased management attention to plant operations. Finally, the operations supervisor is conducting weekly crew meetings to enhance the communication between supervision and the operating crews. Procedure changes, operating policies, future events, and other items of interest are discussed. It is expected that with the division of management responsibilities, additional administrative support and enhanced communication, the overall management in this area will be improved.

With regard to weaknesses concerning operability and surveillance procedures for the station batteries and the Standby Gas Treatment System cited in the PAT Inspection Report and in NRC Inspection Reports 84-20 and 84-26, NPPD is implementing appropriate measures to correct these inadequacies as indicated in References (2) and (3).

In the area of identified weaknesses in control of plant systems and equipment, we are working with Region IV personnel on the follow-up of specific items identified.

Pertinent to weaknesses noted in control of operating procedures, shift turnover checklists, and in general weaknesses regarding station procedures, an independent consultant, KMC, Inc., has been retained by the District to provide an objective assessment of station procedures with regard to content, control of, usability, format and compliance with regulations and industry codes and standards. This assessment is expected to be completed by June 1, 1985. The results will be utilized to upgrade station procedures to resolve noted deficiencies as well as to reflect current industry practices. As a related matter, the District undertook two separate efforts to review the adequacy of the CNS Technical Specifications and procedural compliance with the Technical Specifications. The results of these efforts have been, or will be, used to upgrade both the Technical Specifications and related station procedures.

A review of the program to control the use of overtime for key operations personnel has been conducted. As a result, 12 operator positions were included in the increased staffing plan approved by the Board of Directors in March, 1985. This will aid substantially in meeting the commitment to NUREG-0737 item I.A.1.3.

The PAT team identified several areas of weakness in the Training area. These were the lack of direction and management commitment to training, the lack of written implementing procedures, and weaknesses identified in the training of mechanical and electrical technicians.

Shortcomings in the Training area have been identified previously. The District has acknowledged these shortcomings and has taken, and is continuing to take, actions to eliminate these shortcomings. In September, 1984, the District hired a Training Manager to replace the previous Training Manager who was appointed as a result of the LRS management audit conducted in the Spring of 1983. This individual has over twenty years of experience in the nuclear industry, including Naval Nuclear experience, commercial operations experience and operating plant consulting experience. Since 1983, the CNS training staff has been expanded from one full-time instructor and one part-time instructor to a staff of twenty-one persons (vendor personnel considered). At the time of the PAT inspection, management planning was underway to develop a staffing proposal for the District's Nuclear Power Group. Included in that plan was an increase in training staff. Since the time of the inspection, the staffing plan was completed, presented, and approved by the NPPD General Manager and Board. This plan is presently being implemented. The plan includes a total number of approximately thirty-five training staff to operate the training program and simulator. Some of these staff will be hired directly into the Training Department, but others are being hired into the Operations Department so that they can eventually replace licensed operators, who can then be transferred to the simulator. Additionally, the Technical Staff Manager - Nuclear Power Group has been designated by the Assistant General Manager - Nuclear to provide corporate management overview and direction in the development of new training programs, procedures, and facilities.

Goals and objectives for the training department will be established as an adjunct of an overall Nuclear Training Department Management Plan that is presently being generated. The management plan will contain detail relative as to how NPPD plans to secure INPO accreditation in ten technical areas that include training for mechanical and electrical technicians. It is expected that the management plan will contain sufficient detail to meet the LRS commitment for implementing procedures to effect the plan.

A preliminary design of a Nuclear Training Facility has been completed. This design includes a floor plan and elevations. In the building design, space is included for the simulator and its service areas. The District expects to complete the design and perform some initial construction in 1985. The building should be completed and operational by the end of 1986. In the interim, the District has purchased two temporary structures and will remodel a portion of a warehouse, currently used to support the outage activities, to increase space for training.

The District is currently gathering information and interviewing consultants in preparation for a simulator project. By June 1, 1986, the AGM - Nuclear plans to recommend to the General Manager that the District begin project activities relative to the simulator.

District Management is concerned about the nuclear training area. Steps have been taken and continue to be taken to upgrade this area as regards to personnel, facilities, and programs.

The third category of unacceptable performance was in the Radiological Control area. Noted weaknesses were in the areas of training and experience

of the health physics (H.P.) staff; discrepancies found between TS, USAR, station procedures and actual practices regarding the control of high radiation areas (HRA's); the program for collecting and monitoring potentially contaminated trash; the program to solidify and transport radwaste; and the calibration and control of radiation-monitoring equipment.

In the Radiological Controls area, increased management attention has been directed toward providing training for all involved personnel, as well as closely monitoring job-related training in order to raise competency levels. Additionally, a Senior Technical/Radiological Advisor was assigned in order to improve overall management controls. Since this assignment was made only one week prior to the PAT inspection, the effectiveness would not necessarily have been apparent at the time of the inspection. This position oversees all policies, programs, and practices related to Radiological Controls and provides direction to the Chemistry and Health Physics Supervisor when required. The individual assigned to this position was previously a Radiation Protection Manager per the requirements of Regulatory Guide 1.8 and he reports directly to the CNS Technical Manager.

The effectiveness of these measures has been very evident during the current Reactor Recirculation loop replacement effort. This replacement effort has been the most radiologically-complex evolution yet undertaken by CNS and Radiological Controls problems have been minimal. We expect this trend to continue.

The details of the discrepancies noted between the TS, the USAR, etc., with regard to HRA's are being discussed with cognizant Region IV personnel. Also being discussed with Region IV personnel are the weaknesses noted in collecting and monitoring potentially contaminated trash, the program to solidify and transport radwaste, and the control of radiation-monitoring equipment.

The District takes seriously any commitment made to the NRC and has separate tracking systems at Cooper Nuclear Station and the General Office to ensure commitments are met in a timely manner. Past commitments are being tracked and reviewed on a periodic basis to ensure that adequate progress is being made toward their eventual completion. With regard to the unresolved items identified in Reference 1, NRC Region IV personnel are actively investigating these weaknesses and dialogue with the CNS Resident Inspector indicates prompt resolution of these items is expected in the near future.

As a result of the LRS Management Audit in the Spring of 1983, the District reorganized the corporate nuclear support functions into the Nuclear Power Group (NPG). The General Manager and Board of Directors approved a staffing increase of approximately 50% (97 personnel). Several months ago, it was recognized by NPG Management that several areas, including training as discussed above, were still inadequately staffed. As a result, a staffing plan was prepared and approved by the General Manager and the Board of Directors (in March, 1985) to increase the NPG staff by approximately 35% (108 personnel) over the 1985-86 time frame. This will represent a twofold increase over the staffing level that was in place in July, 1983.

We believe the additional personnel will contribute significantly to ease the work load on the current staff, including management personnel, and thereby allow improvement in the overall efficiency of the entire Nuclear Power Group.

Within the past year, several improvements have been made at CNS to provide more adequate working conditions. These include a large multipurpose facility which includes a new "hot" machine shop and decontamination facilities, increased warehouse capability, and the remodeling of existing structures on site to improve office areas. Additionally, we are currently studying the requirements for office space in light of the staff increase and plan to have recommendations to the General Manager by September 1, 1985. We believe the above-noted significant resource allocations to the Nuclear Power Group, properly applied, will effect an upgrading, of not only the poor performance areas (Category 3) but also those areas currently identified as average.

Should you have any questions or desire further information, please do not hesitate to contact my office.

Sincerely,

L. G. Kuncl
Assistant General Manager-Nuclear

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cc: Regional Administrator
USNRC Region IV