

Nebraska Public Power District

Nebraska's Energy Leader

NLS980156
September 30, 1998

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

Subject: Response to the Systematic Assessment of Licensee Performance (SALP) Report
NRC Inspection Report No. 50-298/98-99
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

- Reference:
1. Letter to G. R. Horn (NPPD) from Ellis W. Merschoff (USNRC) dated August 17, 1998, "Systematic Assessment of Licensee Performance (SALP) Report 50-298/98-99"
 2. Letter to G. R. Horn (NPPD) from J. L. Callan (USNRC), dated February 14, 1997, "Systematic Assessment of Licensee Performance (SALP) Report 50-298/97-99"
 3. NPPD Letter NLS980105 to Document Control Desk (USNRC) from John H. Swailes (NPPD), dated July 8, 1998, "CNS Strategy for Achieving Engineering Excellence, Revision 2"
 4. NPPD Letter NLS980077 to Document Control Desk (USNRC) from John H. Swailes (NPPD), dated May 14, 1998, "Change of Commitment" for actions outlined in NPPD Letter NLS970215 to Director, Office of Enforcement (USNRC) from G. R. Horn (NPPD), dated December 31, 1997, "Reply to a Notice of Violation--NRC Inspection Report Nos. 50-298/97-07 and 97-12," with clarification provided in NPPD Letter NLS980016 to Document Control Desk (USNRC) from P. D. Graham (NPPD), dated January 28, 1998, "Clarification of Commitments"

NRC Inspection Report 50-298/98-99 (Reference 1) provided the Nuclear Regulatory Commission's (NRC) assessment of safety performance at Cooper Nuclear Station (CNS) for the period of January 12, 1997, through July 11, 1998. This letter constitutes Nebraska Public Power District's (District) response to the SALP Report, and confirms actions to achieve improved performance in previously docketed correspondence.

Cooper Nuclear Station

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The District agrees with the NRC's characterizations and concludes that the SALP Report is an accurate and balanced account of CNS's safety performance. The District acknowledges that CNS must continue to focus on improvements in the Engineering and corrective action program areas, while sustaining the superior performance in Plant Support and maintaining intensity in areas of good performance (such as Operations and Maintenance).

Notable improvements in the Operations area are a direct result of the District's focus on control room formality and professionalism, improving procedural adherence, operator training, command and control, and supervisory oversight. Effective management oversight and involvement in site activities have established higher standards for performance not only for Operations, but the entire station. The Work Control Center (WCC), established during the first part of 1998, was a significant contribution to streamlining the relationship between operating and maintaining the plant.

Vital attributes in the quest for excellence in Operations are aggressive self assessment with timely, comprehensive corrective actions, and thorough, rigorous operability evaluations. In addition, the District plans to implement a procedures "betterment" project in 1999 to improve the quality of procedures governing abnormal operating conditions and emergency operations. Lessons learned from Improved Technical Specifications initial implementation will be shared with the operations staff during routine training exercises to enhance the collective knowledge base. The District also contends that the implementation of the Improved Technical Specifications, which occurred on August 15, 1998, will contribute to improved interpretation and execution of Technical Specification requirements during the next assessment cycle. Additionally, continued benchmarking of best practices and the coaching, mentoring and development of shift managers will reinforce the high standards and behaviors necessary to achieve excellent performance in Operations.

Since the 1997 SALP Report (Reference 2), implementation of the Maintenance Improvement and Work Control Improvement Plans began in an effort to continue the progress made in the maintenance functional area. The inception of the WCC and integrated work schedule is counted among CNS's successes in the maintenance and operations areas. The District agrees that, while performance in maintenance was good, it was inconsistent in the areas of preventive maintenance and testing-related processes and programs. The District is nearing the completion of a preventive maintenance program overhaul, which, when coupled with an emphasis on human performance and teamwork with Engineering, will result in a reduction in hardware challenges and "event revealed" issues.

Notwithstanding significant improvements in Engineering from the last SALP cycle (Reference 2), the District shares the NRC's concern with the Category 3 rating in the Engineering area for the third consecutive SALP cycle. A great deal of focused effort is still required to drive performance to a level which meets the standards and expectations of plant management to resolve long-

standing programmatic weaknesses and inconsistent support of Operations and Maintenance, as well as to improve problem identification (and resolution) and the control and maintenance of the CNS design and licensing basis. Consequently, the District has invested significant time and resources to develop the previously docketed "CNS Strategy for Achieving Engineering Excellence" (Reference 3). The District has benefitted from and appreciates the frank and open dialogue which has taken place between the NRC and CNS staffs since the beginning of this SALP cycle during the development of this strategy. The District also fully agrees with the NRC's statement during the public SALP meeting, held September 3, 1998, that follow-through with strategy implementation is essential. To that end, the District looks forward to continued dialogue with the NRC staff for ensuring success in performance improvement.

Concurrent with the successful implementation of the strategy, the District recognizes that increased management involvement, independent oversight, and improved managing of organizational and individual performance is warranted. In addition, enhancements to the engineering support personnel training, improved communications and teamwork within Engineering and with other organizations, effective and comprehensive corrective action implementation, and equipment performance monitoring by System Engineering will also result in improved quality of engineering support to operations and maintenance. Since the key performance issues and corrective actions are discussed in great detail in Reference 3, additional discussion regarding the strategy will not be provided in this response.

The District is pleased with the Staff's recognition of superior performance in the Plant Support category. As a result of the 1997 SALP Report (Reference 2), several actions were initiated to improve performance in Plant Support to a superior level. Emergency Preparedness training was upgraded and the number of drills and training exercises were increased. Vigilance in contamination controls and As Low As Reasonably Achievable (ALARA) program improvements, as well as enhanced Radiation Protection staff knowledge, contributed to CNS's continued role as a leader in the industry in terms of radiation controls, with one of the lowest boiling water reactor three-year person-rem exposure average in the nation. The District agrees that increased oversight of the fitness-for-duty program and behavioral observation will ensure continued excellent performance in the physical security program. To sustain superior performance in the Plant Support areas, the District is considering initiatives such as benchmarking, partnering with other CNS organizations, and continued focus on effective corrective actions.

As documented in Reference 4, the District has developed and is currently implementing a corrective action improvement plan, with a focus on timeliness, scope, extent of condition, and effectiveness of corrective actions. Management involvement plays a significant leadership role in effective corrective action implementation by establishing and clearly communicating consistent expectations for performance and accountability, continued improvement in team-building, and maintaining a human performance focus. The approach to corrective action improvement is multi-disciplined and is largely reliant upon the leadership of the management team. It should be

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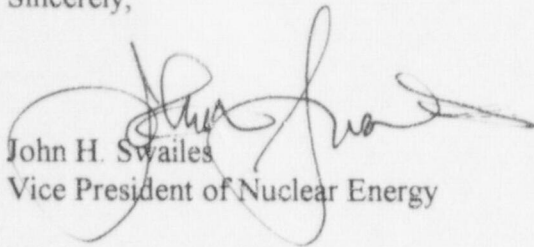
noted that the District views this plan as a "living document," and as such it is subject to review and revision as necessary. The District would be pleased to engage in additional discussions about the plan with the NRC staff, in similar fashion as for the development of Reference 3.

In closing, the District recognizes that, in addition to implementation of the CNS Strategy for Achieving Engineering Excellence (Reference 3), there are two vital factors for success in improving performance. These are (1) the effective implementation of the corrective action program, as it spans the four functional areas and is the cornerstone to safe operation of the facility, and (2) the ability to critically self-assess performance. As such, as previously docketed in Reference 4, CNS will be performing a self assessment of the corrective action improvement plan's effectiveness by March 31, 1999. The District has also scheduled a site-wide self assessment of selected activities.

Again, the District welcomes a continued dialogue with the NRC in the development and implementation of the key improvement strategies, such that CNS may achieve its goals for sustained, excellent performance in all functional areas.

Should you have any questions concerning this matter, please contact me.

Sincerely,



John H. Swailes
Vice President of Nuclear Energy

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cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
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NPG Distribution

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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 NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
Complete the "Procedures Betterment" Project for procedures governing abnormal operating conditions and emergency operations.	12/31/99
Include lessons learned from Improved Technical Specifications initial implementation during routine licensed operator training to enhance the collective knowledge base.	5/30/99