

Nebraska Public Power District

Nebraska's Energy Leader

NLS980165

October 7, 1998

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

Gentlemen:

Subject: Plans for Monitoring Progress of the CNS Strategy for Achieving Engineering Excellence

Reference: 1. 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"

The purpose of this letter is to confirm understandings reached between the Nuclear Regulatory Commission (NRC) and Nebraska Public Power District (District) regarding the District's commitment to achieve sustained improvement in Engineering performance at Cooper Nuclear Station (CNS) and the NRC's plans to monitor specific actions as described in Reference 1 (Strategy). On August 17, 1998, the District and the NRC met to discuss progress on the improvement initiatives and the NRC's plans for monitoring implementation of the Strategy. This was followed by a conference call between the District and the NRC on September 17, 1998, to discuss the specific elements of the Strategy which the NRC would monitor. As a result of these discussions, the District and the NRC agreed upon key actions within the Strategy which will be treated as formal commitments. These commitments are listed in Attachment 1.

The District plans to use self-assessments, senior management evaluations and independent assessments to monitor its progress and ensure successful accomplishment of the objectives and milestones contained within the Strategy. The District agrees with the NRC's intent to schedule a series of additional Focus Meetings to discuss progress in implementation of the Strategy, during which the District will report specific progress toward completion of the commitments contained in Attachment 1 of this letter. It is expected that each of these meetings will be preceded by one or more NRC inspections and the NRC will provide observations regarding the District's progress based primarily upon the inspections and other inputs it may obtain at the meetings. The District anticipates that these interactions will prove to be an effective way to communicate progress as well as the need for adjustments in elements of the Strategy where the effectiveness of execution, or the plan itself, does not meet expectations.

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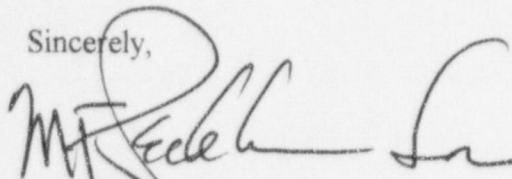
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The District recognizes that the NRC has particular interest in the performance of an Independent Assessment using a panel of recognized experts in the field of engineering at nuclear power plants. The District agrees with this approach, and therefore commits to conduct this Independent Assessment during the summer of 1999 as a means to assure both the District and the NRC that effective progress is being made. Revision 3 to the Strategy, which will be issued during the first quarter of 1999, will reflect action items to support completion of this assessment.

The District is committed to achieving improvement in CNS Engineering performance through the implementation of the planned actions as described in the strategy and recognizes that follow-through is essential to achieve a sustained level of superior performance. The District appreciates and welcomes a continued frank and open dialogue with the NRC regarding the Strategy in support of successful achievement of goals and objectives for performance in the CNS Engineering function.

I will keep you informed in advance if any significant changes in these commitments become necessary.

Sincerely,



John H. Swailes

Vice President of Nuclear Energy

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Attachment

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

STRATEGY FOR ENGINEERING EXCELLENCE
SUMMARY OF COMMITMENTS
COOPER NUCLEAR STATION
NRC DOCKET NO. 50-298, LICENSE DPR-46

The following table outlines the key commitments from the CNS Strategy for Achieving Engineering Excellence. Items which are commitments from previous correspondence are annotated and referenced at the end of this table.

STRATEGY ACTION ITEM	DESCRIPTION	ESTIMATED COMPLETION DATE
1.1.g	Select and enroll Engineering personnel in the plant certification courses.	12/31/02
1.1.o	Develop a six year system improvement plan for each system.	12/31/99
1.4.b (Ref. A)	Implement revised design and licensing basis training (based on results of strategy item 1.4 a, "Conduct a self-assessment of the current design basis training and revise the training, if necessary.").	Begin no later than March, 1999 Complete 12/30/99
1.4.g	Develop and Implement 1998-1999 ESP training and qualification plan	12/31/99
2.3.c	Complete Phase 1 of backlog reduction project.	10/31/98
2.3.d	Complete Phase 2 of backlog reduction project.	7/1/99
3.2.b	Review modifications for installation during RE-18 and RE-19 using a design review team containing CNS and external expertise.	3/31/00
3.2.c	Implement "configuration change" process improvements, Phase 1 (make processes consistent, enhance RCE and minor mod processes).	Complete
3.2.d	Implement "configuration change" process improvements, Phase 2, to align to new Engineering vision.	12/31/98
3.2.e (Refs. B and C)	Complete the unauthorized modification review.	Complete
3.2.f	Verify MWR/configuration change process prevents unauthorized modifications.	12/31/98
3.3.d	Perform review of selected past modifications.	12/31/98
3.3.e (Refs. A and D)	Perform a review of EOPs to validate the appropriate use of safety analysis and design parameter inputs and assumptions.	4/1/99

3.3.f (Refs. A and E)	Conduct "SSFI-type" reviews of primary and secondary containment, focusing on the current design basis and specifically on implementation of these design bases in previously designed modifications.	6/1/99
3.3.g (Ref. E)	Verify that the inputs and assumptions for the station's safety analysis are properly translated into the appropriate policies, procedures and programs.	12/31/02
3.3.i (Ref. A)	Form a multi-disciplined team of internal employees and outside industry consultants to review the adequacy of the specific and generic corrective actions and the degree of their effectiveness for significant conditions adverse to quality between 1990 and the present.	4/1/99
4.3.d	Conduct outside expert review of all SCAQs issued since 4/1/98.	4/1/00
4.3.e (Ref. F)	Complete a comprehensive self-assessment to formally evaluate the effectiveness of actions taken in 1998 with Engineering and its interface with the plant being a significant component. A majority of the assessment team will be off-site experts. Based on the results and what we learn, we will report our progress and revise the strategy.	1/31/99 Complete assessment. 3/1/99 revise strategies.

REFERENCES:

- A. NPPD Letter NLS980103 to Document Control Desk (USNRC) from John H. Swailes (NPPD), dated June 25, 1998, "Anticipated Revisions to CNS Strategy for Achieving Engineering Excellence"
- B. NPPD Letter NLS970056 to Document Control Desk (USNRC) from P. D. Graham (NPPD), dated April 17, 1998, "Reply to a Notice of Violation, NRC Inspection Report No. 50-298/96-25"
- C. NPPD Letter NLS980101 to Document Control Desk (USNRC) from J. H. Swailes (NPPD), dated June 18, 1998, "Change of Commitment"
- D. NPPD Letter NLS980094 to Document Control Desk (USNRC) from J. H. Swailes (NPPD), dated July 23, 1997, "Reply to a Notice of Violation, NRC Inspection Report No. 50-298/98-02"
- E. NPPD Letter NLS970209 to Document Control Desk (USNRC) from M. F. Peckham (NPPD), dated December 12, 1997, "Licensee Event Report No. 97-014"
- F. NPPD Letter NLS980058 to Document Control Desk (USNRC) from J. H. Swailes (NPPD), dated April 9, 1998, "Strategy for Achieving Engineering Excellence, Revision 1"

Correspondence No: NLS980165

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
Select and enroll Engineering personnel in the plant certification courses (Strategy item 1.1.g).	12/31/02
Develop a six year system improvement plan for each system (Strategy Item 1.1.o).	12/31/99
Develop and implement 1998-1999 ESP training and qualification plan (Strategy Item 1.4.g).	12/31/99
Complete Phase 1 of backlog reduction project (Strategy Item 2.3.c).	10/31/98
Complete Phase 2 of backlog reduction project (Strategy Item 2.3.d).	7/1/99
Review modifications for installation during RE-18 and RE-19 using a design review team containing CNS and external expertise (Strategy Item 3.2.b).	3/31/00
Implement "configuration change" process improvements, Phase 1 (make processes consistent, enhance RCE and minor mod processes) (Strategy Item 3.2.c).	Complete.
Implement "configuration change" process improvements, Phase 2, to align to new Engineering vision (Strategy Item 3.2.d).	12/31/98
Verify MWR/Configuration Change process prevents unauthorized modifications (Strategy Item 3.2.f).	12/31/98
Perform review of selected past modifications (Strategy Item 3.3.d).	12/31/98
Conduct outside expert review of all SCAQs issued since 4/1/98 (Strategy Item 4.3.d).	4/1/00
Perform an Independent Assessment of the CNS Strategy for Achieving Engineering Excellence using a panel of recognized experts in the field of engineering at nuclear power plants.	9/1/99