



Nebraska Public Power District

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September 17, 1997

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

Gentlemen:

Subject: Follow-up to NRC/CNS Engineering Focus Meeting of August 21, 1997
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

I found the focus meeting on Operability Assessments (OAs) and 50.59s, conducted on August 21, 1997, to be of tremendous value. I gained a perspective of regulator concerns and issues not possible through the normal inspection process. I thought the meeting was well conducted by both sides of the table. The venue was conducive to open communication and audience participation. It was clear that the NRC and Cooper staff were very interested in improving Cooper performance.

The CNS staff has initiated the following actions relative to lessons learned concerning the operability assessment process and the "test till pass" concerns recently raised by your staff.

1. An immediate action was taken to enhance the procedure governing OA performance by more clearly articulating the requirements for documenting the safety significance of the condition being evaluated. This was completed July 31, 1997, while the inspectors were still on site, in response to their concerns regarding the quality of OAs.
2. The number of active OAs was reduced from in excess of 90 to less than ten. This drastic reduction is due to the fact that previous criteria defining active (open) OAs was not clear. Previously, an OA was still "active" if the Problem Identification Report (PIR) remained open. Therefore, the criteria have been clearly defined, which revealed the fact that many of the conditions identified had been corrected or were not representative of actual degraded/nonconforming conditions, or were controlled by another program (e.g., 10CFR50.65).
3. The concerns raised during the meeting related to cumulative effects have been addressed. The smaller number of active OAs facilitates a more rigorous review of the aggregate effects and integrated risks of active OAs and any compensatory actions. The periodic review by the Station Operations Review Committee (SORC) of the cumulative effects will continue, and will also become a procedure.
4. Effective immediately, OAs will be reviewed by SORC within two weeks of initiation. I expect that this will be a short term initiative to provide a back end review and is designed to create learning opportunities for the organization while improving quality and enhancing plant safety.

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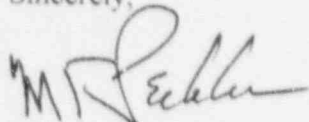
5. OA performance indicators will be established, based on SORC reviews, to measure and monitor effectiveness. In addition, input from Engineering and Operations will be utilized.
6. A project to review and improve the process for OAs has been initiated by the assistant operations manager. INPO will be assisting CNS with this effort and will include industry bench marking, resulting in appropriate procedural guidance.
7. Currently CNS is taking actions to bound the "test till pass" issue by reviewing past surveillances to determine the extent of the condition in this area. This effort is being pursued by our Issues Management Team. Identified problems will be aggressively pursued. In addition, management expectations continue to be reinforced and communicated to the CNS staff.

As we learn more through bench marking and our own experience, these actions will undoubtedly change to adapt to new lessons learned.

I encourage you, to the extent that your schedule will allow, to continue to have these focus meetings at Cooper rather than the region. This provides us with the opportunity to expose a larger number of the site staff to learning opportunities.

I look forward to our next meeting. Should you have any questions concerning this matter, please contact me.

Sincerely,



Mike Peckham
Plant Manager

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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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