

From: [Correll, Brian](#)
To: [Forland, Thomas J.](#)
Cc: [Agrawal, Ami](#)
Subject: RFI for Problem Identification & Resolution Inspection
Date: Thursday, April 15, 2021 3:25:00 PM
Attachments: [2021 CNS PIR Request for Information.pdf](#)

Mr. Forland,

The purpose of this e-mail is to transmit a request for information (RFI) in support of the upcoming Problem Identification & Resolution (PI&R) inspection at the Cooper Nuclear Station, scheduled for the weeks of June 14 and June 28, 2021. This inspection will be conducted using the biennial portion of the NRC Inspection Procedure 71152.

To support the preparation review for this inspection, I request that the material described in the attachment be available for our review by June 2, 2021. If you have any questions or concerns regarding this request, please contact me using the contact information below.

This request does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

This letter and its enclosures will be made available for public inspection and copying at <https://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding.

Thank you,

Brian Correll
Reactor Inspector
NRC Region IV, Div. of Reactor Safety
1600 E. Lamar Blvd, Arlington, Tx 76011
817-200-1565

Information Request
Biennial Problem Identification and Resolution Inspection
Cooper Nuclear Station
April 15, 2021

Inspection Report: 50-298/2021012

Inspection Dates: June 14 – 18 & June 28 – July 2, 2021

This inspection will cover the period from July 1, 2019, through June 13, 2021. All requested information is limited to this period or to the date of this request unless otherwise specified. To the extent possible, the requested information should be provided electronically in word-searchable Adobe PDF (preferred) or Microsoft Office format. If any information requested is determined to be sensitive, the specific handling of this information should be discussed in advance between the NRC inspectors and the Cooper Nuclear Station representatives assigned to the Problem Identification and Resolution Inspection to ensure appropriate handling.

Lists of documents (“summary lists”) should be provided in Microsoft Excel or a similar sortable format. Please be prepared to provide any significant updates to this information during the team’s first week of inspection and then as new information becomes available. As used in this request, “corrective action documents” refers to condition reports, notifications, action requests, cause evaluations, and/or other similar documents, as applicable to Cooper Nuclear Station.

Please provide the following information no later than June 2, 2021:

i. Document Lists

Note: For these summary lists, please include the document/reference number, the document title, initiation date, current status, and long-text description of the issue.

- a. Summary list of all corrective action documents related to significant conditions adverse to quality that were opened, closed, or evaluated during the period
- b. Summary list of all corrective action documents related to conditions adverse to quality that were opened or closed during the period
- c. Summary list of all condition reports related to non-conditions adverse to quality that were opened or closed during the period
- d. Summary list of all apparent cause evaluations (or equivalent) performed during the period; if fewer than approximately 40, provide full documents and attachments
- e. Summary list of all currently open corrective action documents associated with conditions first identified prior to the beginning of the inspection period
- f. Summary list of all corrective action documents that were upgraded or downgraded in priority/significance during the period (these may be limited to those downgraded from, or upgraded to, apparent-cause level or higher)
- g. Summary list of all corrective action documents initiated during the period that identify an adverse or potentially adverse trend in safety-related or

risk-significant equipment performance or in any aspect of the station's safety culture.

- h. Summary lists of operator workarounds, operator burdens, temporary modifications, and control room deficiencies (1) currently open and (2) that were evaluated and/or closed during the period; this should include the date that each item was opened and/or closed.
- i. Summary list of all prompt operability determinations or other engineering evaluations to provide reasonable assurance of operability; if fewer than approximately 20, provide full documents and attachments
- j. Summary list of plant safety issues raised or addressed by the Employee Concerns Program (or equivalent) (sensitive information should be made available by appropriate means after discussion with the team lead)

2. Full Documents with Attachments

- a. All root cause evaluations completed during the period; include a list of any planned or in progress
- b. Quality Assurance audits performed during the period
- c. Audits/surveillances performed during the period on the Corrective Action Program, of individual corrective actions, or of cause evaluations
- d. Functional area self-assessments and non-NRC third-party assessments (e.g., peer assessments performed as part of routine or focused station self- and independent assessment activities; do not include INPO assessments) that were performed or completed during the period; include a list of those that are currently in progress
- e. Any assessments of the safety-conscious work environment at Cooper Nuclear Station including any safety culture survey results; if none performed during the inspection period, provide the most recent
- f. Corrective action documents generated during the period associated with the following:
 - i. NRC findings and/or violations issued to Cooper Nuclear Station
 - ii. Licensee Event Reports issued by Cooper Nuclear Station
- g. Corrective action documents generated for the following, if they were determined to be applicable to Cooper Nuclear Station (for those that were evaluated but determined not to be applicable, provide a summary list):
 - i. NRC Information Notices, Bulletins, and Generic Letters issued or evaluated during the period
 - ii. Part 21 reports issued or evaluated during the period

- iii. Vendor safety information letters (or equivalent) issued or evaluated during the period
- iv. Other external events and/or operating experience evaluated for applicability during the period
- h. Corrective action documents generated for the following:
 - i. Maintenance preventable functional failures that occurred or were evaluated during the period
 - ii. Adverse trends in equipment, processes, procedures, or programs that were evaluated during the period
 - iii. Action items generated or addressed by offsite review committees during the period

3. Logs and Reports

- a. Corrective action performance trending/tracking information generated during the period and broken down by functional organization (if this information is fully included in item 3.b, it need not be provided separately)
- b. Current system health reports, Management Review Meeting package, or similar information; provide past reports as necessary to include greater-than-or-equal to 12 months of metric/trending data
- c. Radiation protection event logs during the period
- d. Security event logs and security incidents during the period (sensitive information should be made available during the team's first week—do not provide electronically) – Handling of this item will need additional discussion
- e. Employee Concerns Program (or equivalent) logs (sensitive information should be made available during the team's first week of inspection—do not provide electronically)
- f. List of training deficiencies, requests for training improvements, and simulator deficiencies for the period

Note: For item 3.c–3.d, if there is no log or report maintained separate from the corrective action program, please provide a summary list of corrective action program items for the category described.

4. Procedures

Note: For these procedures, please include all revisions that were in effect at any time during the period.

- a. Corrective action program procedures, to include initiation and evaluation procedures, operability determination procedures, cause evaluation procedures, and any other procedures that implement the corrective action program at Cooper Nuclear Station, including applicable corporate procedures
- b. Quality Assurance program procedures (specific audit procedures are not necessary)
- c. Employee Concerns Program (or equivalent) procedures
- d. Procedures that implement/maintain a Safety Conscious Work Environment
- e. Conduct of Operations procedure (or equivalent) and any other procedures or policies governing control room conduct, operator burdens and workarounds, etc.
- f. Maintenance rule procedures and any procedures implementing any portion of the maintenance rule at Cooper Nuclear Station
- g. Operating experience program procedures and any other procedures or guidance documents that describe the site's use of operating experience information

5. Other

- a. List of risk-significant components and systems, ranked by risk worth; if the list uses system designators, provide a list of the associated equipment/system names
- b. List of structures, systems and components and/or functions that were in maintenance rule (a)(1) status or evaluated for (a)(1) status at any time during the inspection period; include dates and results of expert panel reviews and dates of status changes
- c. Organization charts for plant staff and long-term/permanent contractors
- d. Electronic copies of the Updated Final Safety Analysis Report (or equivalent), technical specifications, and technical specification bases, if available
- e. Table showing the number of corrective action documents (or equivalent) initiated during each month of the inspection period, by screened significance
- f. For each day the team is inspecting,
 - i. Planned work/maintenance schedule for the station
 - ii. Schedule of management or corrective action review meetings (e.g. operations focus meetings, condition report screening meetings, Corrective Action Review Boards, Management Review Meetings, challenge meetings for cause evaluations, etc.)
 - iii. Agendas and materials for these meetings

Note: Please provide the items listed in 5.f on a daily basis

All requested documents should be provided electronically (e.g., Certrec's IMS) where possible.

Brian Correll
U.S. NRC Reactor Inspector
Inspection Program and Assessment Team
Division of Reactor Safety, Region IV
1600 E. Lamar Blvd, Arlington, TX 76011
Brian.Correll@nrc.gov