



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

March 5, 2012

Mr. Brian J. O'Grady, Vice President-Nuclear
And Chief Nuclear Officer
Nebraska Public Power – Cooper
Nuclear Station
72676 648A Avenue
Brownville, NE 68321

SUBJECT: ANNUAL ASSESSMENT LETTER FOR COOPER NUCLEAR STATION
(REPORT NUMBER 05000298/2012001)

Dear Mr. O'Grady:

On February 15, 2012, the NRC completed its end-of-cycle performance review of Cooper Nuclear Station. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from January 1, 2011 through December 31, 2011. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. This performance review and enclosed inspection plan do not include security information. A separate letter will include the NRC's assessment of your performance in the Security Cornerstone and its security-related inspection plan.

The NRC determined the performance at Cooper Nuclear Station during the most recent quarter was within the Regulatory Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because one inspection finding had low to moderate (i.e., White) safety significance, while all other findings had very low (i.e., Green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., Green). The White finding involved the failure to verify that procedure steps to safely shut down the plant in the event of a fire would actually reposition three motor-operated valves to the required positions, while addressing a previous finding that involved the same procedure steps. On December 2, 2011, the NRC completed Inspection Procedure 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area." The NRC concluded that your staff performed an acceptable evaluation of the White finding. You identified the cause and took corrective action to prevent recurrence. The NRC considers this finding closed. Because that finding is no longer considered an Action Matrix input, at the beginning of the current quarter, performance at Cooper Nuclear Station was within the Licensee Response Column of the Action Matrix. Therefore, the NRC plans to conduct only ROP baseline inspections at your facility.

The NRC identifies a substantive cross-cutting issue (SCCI) to communicate a concern with the licensee's performance in a cross-cutting area and to encourage the licensee to take appropriate actions before more-significant performance issues emerge.

In our assessment letter dated March 4, 2011 (ML110620053), the NRC opened an SCCI in the human performance area associated with the decision-making component related to the use of conservative assumptions in decision-making [H.1(b)]. To address this theme, your staff implemented corrective actions emphasizing that decision-making reflects safety first, encouraging your staff to cultivate a questioning attitude, improving monitoring and oversight of decision-making, implementing case-study training with involved departments, and establishing measurable objectives to monitor the effectiveness of that training. The NRC noted that since full implementation of these corrective actions, only one finding with an H.1(b) cross-cutting aspect has been identified. The NRC considers that these results demonstrate sustainable performance improvements that are evidenced by effective implementation of an appropriate corrective action plan that has resulted in no safety-significant inspection finding and a notable reduction in the overall number of inspection findings with the same common theme. On the basis of these results, the NRC is closing this SCCI.

The NRC identified a cross-cutting theme in the Work Practices component of the Human Performance area. Specifically, the theme consisted of six findings with a cross-cutting aspect in communicating and using human-error prevention techniques and/or proceeding in the face of uncertainty [H.4(a)]. The NRC determined that an SCCI does not exist because the NRC does not have a concern with your staff's scope of effort and progress in addressing the cross-cutting theme. The NRC noted that you had acknowledged this theme by initiating Condition Report CR-CNS-2011-08283 in July, 2011, completing the associated investigation in October, 2011, implementing corresponding corrective actions in November, 2011, and scheduling an associated self-assessment effectiveness review in March, 2012.

The NRC also identified a cross-cutting theme in the Corrective Action component of the Problem Identification and Resolution area. The theme consists of seven findings with a cross-cutting aspect in the thoroughness of problem evaluation such that the resolutions address causes and extent of condition [P.1(c)]. The NRC determined that an SCCI exists because the NRC has a concern with your staff's scope of effort and progress in addressing this cross-cutting theme. Specifically, your staff did not develop corrective actions to address identified concerns involving the utilization of resources to perform problem evaluations. The SCCI in P.1(c) will remain open until your staff demonstrates sustainable performance improvements as evidenced by effective implementation of an appropriate corrective action plan that results in no safety significant inspection finding and a notable reduction in the overall number of inspection findings with the same common theme. The NRC will monitor your staff's effort and progress in addressing the SCCI by inspecting your response to this theme after you notify us, in writing, of your readiness for inspection.

The enclosed inspection plan lists the inspections scheduled through June 30, 2013. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If you have any questions regarding this letter, please contact Vince Gaddy at 817-200-1144.

Sincerely,

/T. Pruett for/

Kriss M. Kennedy, Director
Division of Reactor Projects

Docket: 50-298
License: DRP-46

Enclosure: Cooper Nuclear Station Inspection/Activity Plan

cc: w/enclosure via Electronic Distribution

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ADAMS	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> SUNSI Review Complete	Reviewer Initials: VGG
Category B.1	<input checked="" type="checkbox"/> Publicly Available	<input checked="" type="checkbox"/> Non-sensitive		
Category A	<input type="checkbox"/> Non-publicly Available	<input type="checkbox"/> Sensitive		
Non-sensitive				
C:DRP	D:DRS	D:DRP		
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