



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

September 3, 2013

Mr. Oscar A. Limpias, Vice President-Nuclear  
and Chief Nuclear Officer  
Nebraska Public Power District  
Cooper Nuclear Station  
72676 648A Avenue  
Brownville, NE 68321

SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR COOPER NUCLEAR STATION  
(REPORT 05000298/2013006)

Dear Mr. Limpias:

On August 14, 2013, the NRC completed its mid-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 July 1, 2012 through June 30, 2013. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined the performance at Cooper Nuclear Station (CNS) during the most recent quarter was within the Licensee Response Column of the NRCs Reactor Oversight Process (ROP) Action Matrix because all inspection 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). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

In our end-of-cycle assessment letter dated March 4, 2011 (ML110620053), the NRC identified a substantive cross-cutting issue (SCCI) related to the use of conservative decision-making [H.1(b)]. In our assessment letter dated March 5, 2012 (ML120650243), the NRC opened an SCCI in the problem identification and resolution area associated with the corrective action component related to the thoroughness of problem evaluation such that the resolutions address causes and extents of condition [P.1(c)]. Also, in our end-of-cycle assessment letter dated March 4, 2013 (ML130603A76), the NRC identified an SCCI in the resources component of the human performance area associated with complete, accurate and up-to-date design documentation, procedures, and work packages, and correct labeling of components [H.2(c)].

In these three letters, the NRC stated that each SCCI would remain open until your staff demonstrated sustainable performance improvements as evidenced by effective implementation of an appropriate corrective action plan that resulted in no safety significant inspection finding and a notable reduction in the overall number of inspection findings with the same common theme. The NRC also stated that we would assess each area for closure, after you notified the NRC of your readiness for inspection.

In our end-of-cycle assessment letter dated March 4, 2013 (ML130603A76), the NRC asked your staff to arrange to perform an independent assessment of the site safety culture; provide written responses to all three SCCIs [H.1(b), P.1(c), and H.2(c)]; notify the NRC, in writing, of your readiness for inspection of these themes; and arrange to hold a public meeting to describe your plans to address these SCCIs. In your letter dated April 1, 2013 (ML13105A135), you informed the NRC that your staff had created, and were implementing, an improvement plan that addressed five areas, including Organizational Effectiveness and the Corrective Action Program. In your letter dated May 28, 2013 (ML13155A141), you provided the results of a root cause evaluation to identify corrective actions needed to address the SCCIs, and informed the NRC that your staff had performed an independent assessment of the site safety culture.

The public meeting requested in our letter dated March 4, 2013, was held on June 26, 2013 (ML13178A159). In that meeting, your staff informed the NRC that they had completed a collective root-cause evaluation of the SCCIs in H.1(b), P.1(c), and H.2(c), and that the root causes of these three SCCIs were:

- CNS standards related to the resolution of apparently low-significance regulatory issues are low and do not meet fleet or industry expectations, and
- CNS Engineering and Operations departments are not proficient in the application of the licensing and design basis of the plant.

You also informed the NRC that you had completed some corrective actions to address these causes, and had scheduled other corrective actions for future completion.

With respect to closing these SCCIs, the NRC noted that:

- the NRC has not identified a safety-significant inspection finding with any of the corresponding cross-cutting aspects;
- during the current assessment period, the corresponding cross-cutting themes have fewer numbers of findings than they did when we declared the SCCIs; and
- you have implemented a corrective action plan to collectively address these SCCIs.

However, you have not notified the NRC of your readiness for inspection of these SCCIs. Through conversations with your licensing staff, the NRC understands that you expect to complete the remaining corrective actions (except for effectiveness reviews) in October, 2013, and that you therefore expect soon afterward to inform us of your readiness for inspection of these SCCIs. Therefore, the SCCIs in P.1(c), H.1(b), and H.2(c) will remain open until your staff fully demonstrates sustainable performance improvements as evidenced by effective implementation of an appropriate corrective action plan that results in no safety significant inspection finding and notable reductions in the overall numbers of inspection findings with the corresponding cross-cutting themes, and the NRC assesses these areas for closure after you notify us, in writing, of your readiness for inspection.


The enclosed inspection plan lists the inspections scheduled through December 31, 2014. 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. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence.

Also, from July 1, 2012, to June 30, 2013, the NRC issued three severity-level-IV traditional-enforcement violations associated with a failure to obtain prior NRC approval for a change regarding the supplemental diesel generator, a failure to notify the NRC within eight hours of a nonemergency event, and a failure to maintain operator examination integrity. Therefore, the NRC plans to conduct Inspection Procedure 92723, "Follow Up Inspection for Three or More Severity Level IV Traditional Enforcement Violations in the Same Area in a 12-Month Period," to follow-up on these violations, after you notify us, in writing, of your readiness for that inspection.

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 a 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).

Please contact me at (817) 200-1144 with any questions you have regarding this letter.

Sincerely,



Jessie Quichocho, Chief (Acting)  
Project Branch C  
Division of Reactor Projects

Docket No.: 50-298  
License No.: DPR-46

Enclosure: Cooper Nuclear Station Inspection/Activity Plan

**Cooper**  
**Inspection / Activity Plan**  
**09/01/2013 - 12/31/2014**

| Unit Number | Planned Dates<br>Start      End | Inspection Activity | Title | No. of Staff on Site |
|-------------|---------------------------------|---------------------|-------|----------------------|
|-------------|---------------------------------|---------------------|-------|----------------------|

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|---|-----------------------|------------------------------|--|---|
| 1 | 06/23/2014 06/27/2014 | <b>EXAM</b><br>X02529        | <b>- INITIAL OPERATOR EXAM</b><br>INITIAL EXAM- COOPER (12/1/14)                                       | 4 |
| 1 | 07/28/2014 08/02/2014 | X02529                       | INITIAL EXAM- COOPER (12/1/14)   | 5 |
| 1 | 10/07/2013 10/11/2013 | <b>EB2-03</b><br>IP 71003    | <b>- POST-APPROVAL LICENSE RENEWAL</b><br>Post-Approval Site Inspection for License Renewal            | 2 |
| 1 | 10/21/2013 10/25/2013 | IP 71003                     | Post-Approval Site Inspection for License Renewal  | 2 |
| 1 | 06/02/2014 07/10/2014 | <b>EP-2</b><br>IP 7111408    | <b>- EXERCISE SCENARIO REVIEW</b><br>Exercise Evaluation – Scenario Review                             | 2 |
| 1 | 06/16/2014 06/20/2014 | <b>RS24</b><br>IP 71124.02   | <b>- RADIATION SAFETY</b><br>Occupational ALARA Planning and Controls                                  | 1 |
| 1 | 06/16/2014 06/20/2014 | IP 71124.04                  | Occupational Dose Assessment   | 1 |
| 1 | 08/04/2014 08/08/2014 | <b>EP-1</b><br>IP 71151-EP01 | <b>- EP PERFORMANCE INDICATORS</b><br>Drill/Exercise Performance                                       | 5 |
| 1 | 08/04/2014 08/08/2014 | IP 71151-EP02                | ERO Drill Participation  | 3 |
| 1 | 08/04/2014 08/08/2014 | IP 71151-EP03                | Alert & Notification System  | 3 |
| 1 | 08/04/2014 08/08/2014 | <b>EP-3</b><br>IP 7111407    | <b>- BIENNIAL EXERCISE INSPECTION HAB</b><br>Exercise Evaluation - Hostile Action (HA) Event           | 3 |
| 1 | 10/06/2014 10/10/2014 | <b>RS13</b><br>IP 71124.01   | <b>- RADIATION SAFETY</b><br>Radiological Hazard Assessment and Exposure Controls                      | 1 |
| 1 | 10/06/2014 10/10/2014 | IP 71124.03                  | In-Plant Airborne Radioactivity Control and Mitigation   | 1 |
| 1 | 10/06/2014 10/10/2014 | IP 71151-OR01                | Occupational Exposure Control Effectiveness  | 1 |
| 1 | 10/06/2014 10/10/2014 | IP 71151-PR01                | RETS/ODCM Radiological Effluent  | 1 |
| 1 | 10/27/2014 10/31/2014 | <b>EB2-03</b><br>IP 71003    | <b>- POST-APPROVAL LICENSE RENEWAL (FOLLOWUP)</b><br>Post-Approval Site Inspection for License Renewal | 1 |

This report does not include INPO and OUTAGE activities.  
 This report shows only on-site and announced inspection procedures.