UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

March 16, 2005

Randall K. Edington, Vice
President-Nuclear and CNO
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

SUBJECT: NRC BIENNIAL LICENSED OPERATOR REQUALIFICATION AND SUPPLEMENTAL FOLLOWUP INSPECTION REPORT 05000298/2004015

Dear Mr. Edington:

The Nuclear Regulatory Commission (NRC) conducted the onsite portion of the biennial licensed operator requalification inspection and a followup inspection to the supplemental inspection (NRC Inspection Report 05000298/2004011) at Cooper Nuclear Station from November 15-19, 2004. The in-office portion of the requalification inspection was conducted from November 22, 2004, through February 2, 2005. Inspection debriefs were held onsite on November 19, 2004, and a telephonic exit meeting was held with your staff on February 2, 2005. The enclosed report documents the inspection findings, which were discussed with you and other members of your staff.

This inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure 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).

Sincerely,

/RA

Anthony T. Gody, Chief
Operations Branch
Division of Reactor Safety

Docket: 50-298
License: DPR-46

Enclosures:
Inspection Report 05000298/2004-15;
w/Attachment Supplemental Information

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CNS Site Secretary **(SLN)**

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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket:	50-298
License:	DPR 46
Report No.:	05000298/2004015
Licensee:	Nebraska Public Power District
Facility:	Cooper Nuclear Station
Location:	P.O. Box 98 Brownville, Nebraska
Dates:	November 15, 2004, through February 2, 2005
Inspector(s):	P. Gage, Senior Operations Engineer S. Garchow, Operations Engineer J. Williams, Operations Engineer
Approved By:	A. Gody, Chief Operations Branch Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000298/2004015; November 15, 2004, through February 2, 2005; Cooper Nuclear Station: Biennial Licensed Operator Requalification Inspection (IP 71111.11B).

The inspection report covered a 6-week period of inspection by three regional operations engineers. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

NRC-Identified and Self Revealing Findings

No findings of significance were identified.

REPORT DETAILS

1 REACTOR SAFETY

1R11 Licensed Operator Requalification

a. Inspection Scope

This inspection evaluated licensed operator performance in mitigating the consequences of events, since poor licensed operator performance results in increased risk through increased operator recovery rates and licensed personnel-induced common-cause error rates assumed in the licensee's individual plant examinations. This inspection effort of the licensed operator requalification program included the following major areas (1) facility operating history, (2) requalification written examinations and operating tests, (3) licensee training feedback system, and (4) licensee remedial training program.

Operator performance since the last requalification program evaluation was assessed to determine if performance deficiencies have been addressed through the requalification training program.

Examination security measures and procedures were evaluated for compliance with 10 CFR 55.49. The licensee's sample plan for the written examinations was evaluated for compliance with 10 CFR 55.59 and NUREG-1021 as referenced in the facility requalification program procedures. In addition, the inspectors (1) reviewed pass/fail results of the written examinations, individual operating tests, and simulator operating tests; (2) interviewed personnel regarding the policies and practices for administering examinations; (3) observed the administration of two dynamic simulator scenarios to one requalification crew by facility evaluators, and (4) observed two facility evaluators administer two job performance measures in the control room simulator in a dynamic mode.

The inspectors verified the adequacy and effectiveness of the remedial training conducted since the last requalification examinations and the training planned for the current examination cycle to ensure that licensed operator or crew performance weaknesses identified during training and plant operations were addressed. Remedial training and examinations for four individuals who failed their written examinations were reviewed for compliance with facility procedures and responsiveness to address areas failed.

The inspectors assessed the adequacy of the Cooper Nuclear Station simulator facility for use in operator licensing examinations and training as prescribed in 10 CFR 55.46, "Simulation Facilities." The inspectors reviewed a sample of simulator performance test records from the 2004 performance tests required by 55.46(c)(3)(d) and ANSI/ANS 3.5-1985, "Nuclear Power Simulators for Use in Operator Training." The inspectors also reviewed simulator discrepancy and modification records, and the process for ensuring continued simulator fidelity required by 10 CFR 55.46. Open

simulator discrepancies were reviewed for importance relative to the impact on operator actions and significance with respect to the reference plant. The inspectors discussed the discrepancies with operating training and simulator support staffs and used the checklist in Inspection Procedure 71111.11, Appendix C, to evaluate whether or not the licensee's plant-referenced simulator was operating adequately as required by 10 CFR55.46(c), (d) and ANSI/ANS 3.5-1985.

b. Findings

Simulation Facility Conformance with 10 CFR 55.46

During the inspection, extensive discussions focused on the capability of the simulator to accurately represent the reference plant conditions. The inspectors noted that a number of simulator deficiency reports had been documented, and included essentially every major system in the plant. Many of these documented deficiencies had existed for an extended period of time (10 years or more). These simulator deficiencies, compared to the reference plant, provide the potential for negative training in both the initial and requalification licensed operator training programs, in that the deficiencies could adversely affect operator actions on the reference plant. Nevertheless, the inspectors did not identify any instances other than the one previously documented in NRC Inspection Report 05000298/2004011 where the identified simulator deficiencies had adversely affected plant operations. Furthermore, the inspectors did not identify any impact on plant equipment or personnel safety due to the relatively large number of open deficiencies. However, the inspectors concluded that these deficiencies limited the ability of the simulator to replicate expected plant response as required by 10 CFR 55.46(c)(1).

The inspectors classified many of these simulator deficiencies as inaccuracies or unexpected responses. Of particular concern was the simulator's lack of modeling of some parameters to allow training and testing in some portions of the plant's emergency operating procedures. The following examples provide some of the simulator limitations pertaining to various anticipated transient without scram (ATWS) and accident analysis conditions:

(1) Drywell temperature will rise much faster during a loss-of-coolant accident in the plant than it does on the simulator. Additionally, the emergency operating procedures direct the operators to maintain drywell temperature below the design limit of 280 degrees, however, the simulator model is unable to exceed 280 degrees, precluding realistic emergency operating procedures training for restoring drywell temperature during post lost of coolant accident conditions.

(2) Training is not performed on the emergency operating procedures ATWS power level control because of the lack of simulator modeling for anticipating transient without scram natural circulation. The simulator maintains a constant reactor power for a given rod pattern regardless of reactor water level.

(3) Use of boron in emergency operating procedures ATWS scenarios produces an immediate homogeneous reduction in steady state reactor power on the simulator. In the plant, using boron will not cause an immediate uniform reduction in power until it travels down the downcomer using natural circulation and back up through the reactor core. Even then, reactor power will oscillate in various parts of the core.

(4) During a simulated ATWS if water is injected into the reactor, reactor power pegs high, and reactor pressure rises rapidly. Reactor power then drops off and reactor pressure remains at approximately 600 psig with no injection, downscale average power range monitoring indications, and six open safety relief valves. Whereas, the expected response with no reactor power, no injection, and open safety relief valves would be a continued reduction in reactor pressure.

(5) During ATWS conditions and the main steam isolation valves closed, reactor power pegs high and is unmanageable even with reactor pressure vessel level lowered to the top of the active fuel.

(6) The simulator's reactor manual control system allows the operator to select and move control rods during conditions when the reference plant would inhibit rod motion. This is particularly important during anticipating transient without scram scenarios or rod misalignment events. Also, in some instances, the simulator's rod out permissive light is lit, which indicates manual rod withdrawal is permitted when it is inhibited in the plant.

(7) The plant design of the recirculation loops, jet pumps, and lower core plate are such that reactor water level should remain at a minimum of 2/3 core height. The simulator facility has not properly modeled this design basis accident, since reactor water level continues to drop below 2/3 core height on a recirculation loop break. In addition, in the simulator, one safety injection system will maintain reactor water level above the top of active fuel with a double ended recirculation loop pipe break. According to the industry analysis, additional injection plans would be required to maintain reactor water level above the top of active fuel.

(8) In the simulator, reactor water level indicators do not become erratic under rapid depressurization conditions. Erratic level indications should occur because the rapid depressurization results in reference leg flashing. This reference leg flashing phenomenon is particularly evident with elevated drywell temperatures, as expected during a loss-of-coolant accident.

(9) In the simulator, reactor water level should lower at a rate of about 4 inches per minute that is initiated at 5 percent reactor power. On the simulator, during a reactor water level returns to the normal band and remains there, preventing scenario training on the emergency operating procedures for ATWS at low power levels.

The inspectors found that if left uncorrected, these simulator deficiencies would adversely affect the simulator's ability to correctly model the expected plant behavior, as required by 10 CFR 55.46(c)(1) and, therefore, could adversely affect licensee operator training and operations. This item is unresolved pending licensee's ability to demonstrate the simulator's capability of replicating expected plant conditions encountered during emergency, abnormal, and normal evolutions.
URI 05000298/200415-01, Simulator Fidelity.

Simulator Performance Testing

10 CFR 55.4, defines performance testing ". . . testing conducted to verify a simulation facility's performance as compared to actual or predicted reference plant performance." Further, 10 CFR 55.46(c)(1) requires that plant-referenced simulators "must demonstrate expected plant response to operator input and to normal, transient, and accident conditions to which the simulator has been designed to respond." Lastly, 10 CFR 55.46(d)(1) requires performance testing be conducted to provide continued assurance of simulator fidelity. To be consistent with the definition of "performance testing" in ANSI/ANS-3.5-1985 and 10 CFR 55.46, such testing must include a comparison of the results of integrated operation of the simulation facility to actual or predicted reference plant data.

The inspectors reviewed records of two transient simulator performance tests from the 2004 performance tests required by 10 CFR 55.46(c)(3)(d) and ANSI/ANS 3.5-1985.

(1) Transient 4, "Simultaneous Trip of Both Recirc Pumps," and

(2) Transient 10, "Closure of all MSIVs with a Single Stuck Open Relief Valve."

Based upon this review and discussions with simulator staff, the inspectors determined that the transient simulator transients performance test results were not compared to best estimate data required by ANSI/ANS 3.5-1985 as endorsed by NRC Regulatory Guide 1.149, Revision 1. This industry standard defines "best estimate" as "reference plant response data based upon engineering evaluation or operational assessment." For the tests reviewed, test records did not provide any comparison of current test data to actual or predicted plant performance. Instead, for Transient 4, data for a single recirculation pump trip was used, and for Transient 10, safety analysis report data for a turbine trip without bypass was used. For Transient 10, the simulator exhibited a pronounced pressure spike when the main steam isolation valves closed, but lacked a corresponding average power range monitor increase as expected when steam voids collapse and positive reactivity is added to the core.

The two simulator performance tests reviewed did not sufficiently demonstrate that meaningful and adequate testing and documentation was conducted to verify the simulator's performance as compared to actual or predicted reference plant performance. ANSI/ANS-3.5-1985 requires that a record of the conduct of these tests, and a data comparison that the results meet reference unit data, shall be maintained.

The simulator performance tests lacked required data comparisons, and meaningful evaluation criteria of test results. The sampled performance tests included a validation checklist used by the licensee to ensure that the expected or predicted plant condition can be used on the simulator for evaluating the performance of operators. The inspectors observed that the checklist relied heavily upon inferred or implied simulator performance from observations, for the most part, rather than a comparison to expected or predicted reference plant performance and was, therefore, an ineffective tool for verification of simulator performance.

Insufficient and inadequate performance testing and documentation raise questions as to the adequacy or suitability of the license's simulation facility for conducting operating test scenarios. Because ANSI/ANS-3.5-1985 does not provide details regarding the extent of the comparison between the simulator and actual or predicted plant performance some confusion has developed regarding proper interpretation of the standard in this area. The adequacy of the licensee's performance test criteria is unresolved, pending the clarification of ANSI standard and regulatory requirements and the subsequent determination of whether this item is more than minor. URI 05000298/2004015-02, Acceptance Criteria for Simulator Performance Testing.

4OA5 Other, Supplemental Inspection Followup

At the end of 2003 and early 2004 the licensed operators at the Cooper Nuclear Station were administered a biennial examination. Because greater than 25 percent of the licensed operators failed the written portion of the examination, the NRC issued a White inspection finding in NRC Inspection Report 05000298/2004011. This is documented in a letter to the licensee dated June 25, 2004. A subsequent Notice of Violation was also issued in NRC Inspection Report 05000298/2004011 for failing to adequately implement a systems approach to training. Specifically, the licensee had deficiencies in Elements 1 (Analysis) and 4 (Trainee Evaluation) of the systems approach to training process. The corrective actions associated with the previously issued White finding were tracked utilizing the facility's corrective action process, as documented in Significant Condition Report SCR 2003-1966. The inspectors noted that the extent of condition for the corrective actions was documented as part of Condition Report CR-CNS-2003-7461. The inspectors determined that the root cause, extent of condition, and associated corrective actions were appropriately performed. With the designated actions in place, the White finding issue for a high examination failure rate is closed.

During this inspection, the inspectors performed a followup assessment on the effectiveness of the corrective actions taken in response to the White inspection finding and Notice of Violation. The inspector's followup included a review of the licensed operator requalification training program exams administered over the past eight months. The results of this inspection activity are detailed below.

There were several contributors identified in the licensee's root cause report and NRC Inspection Report 05000298/2004011 associated with deficiencies in the systems

approach to training process Element 1, Analysis. The more significant of these deficiencies and their associated corrective actions are discussed below:

The number of hours dedicated to the licensed operator requalification training program had been reduced by 8 hours per crew per training cycle. In effect, this was a 20 percent reduction in the number of hours dedicated to licensed operator requalification training. In addition, the amount of training needed was increased over this training period (see below). The inspectors concluded that the corrective action to reestablish licensed operator requalification training to a 40-hour training week was complete and effectively implemented.

1. Over the last few years, the facility's licensed operator requalification training experienced an increase in demand by various organizational functions for training operators on non-core topics. Much of this training was added to the licensed operator requalification training schedule without formal analysis or review by operations, training management, or the operations performance improvement committee. Corrective actions included establishing controls that forced strict compliance with the licensed operator requalification training schedule. The inspectors determined that schedule content changes currently are procedurally limited to 10 percent for the 2-year licensed operator requalification training cycle. A licensee training performance indicator has been established to monitor this corrective action. The inspectors concluded that the corrective actions for this issue appear to be effectively implemented.

2. Licensee management oversight of licensed operator requalification training was not effective in preventing a high failure rate on the biennial examination. The management team was unaware of format and content differences in the biennial examination as compared to previous examinations. The licensee's corrective actions included the requirement to obtain operations management approval for content changes to the licensed operator requalification training schedule, chairing oral boards that are held for operator qualifications, and attending the performance improvement committee meetings. The inspectors determined that these actions were effectively implemented.

A second contributor to the high operator failure rate was ineffective evaluations of operator knowledge as required by Element 4 of the systems approach to training process. Immediately following the last biennial examination, the licensee implemented an examination policy for the licensed operator requalification training program, which recommended that a written examination be administered each licensed operator requalification training cycle, and required that a written examination be administered at least every other training cycle. This policy change was required that, if an examination covered two training cycles, then the examination questions must cover both training cycles. The inspectors verified that a written examination was administered each training cycle since the previous biennial examination. The examination questions were also reviewed and found to effectively cover the training material and sufficiently challenge operator knowledge. The inspectors concluded that the corrective actions

taken to effectively implement Element 4 - Trainee Evaluation, were effectively implemented.

A third contributor to the high failure rate was ineffective tracking of licensed operator marginal performers. The corrective action for this contributor was the development of a licensed operator requalification training program that identified and tracked marginal performers in the licensed operator requalification training program. The inspectors noted that individuals identified as marginal performers were required to improve their performance through activities ranging from self-study to appearing before a knowledge assessment oral board. Continued marginal performance could potentially result in the removal of the operator from licensed duties. Since initiation of this corrective action, the operating license of seven individuals had been removed by the facility. The inspectors determined that the corrective action appeared to be effectively implemented.

4OA6 Meetings, Including Exit

On November 15 through December 13, 2004, the inspectors discussed the inspection results with Mr. R. Edington, Vice President, and members of his staff. On February 2, 2005, during a telephonic exit the inspectors presented the inspection results to Mr. J. Roberts, Director of Nuclear Safety Assurance. The inspectors confirmed that proprietary information was not provided or examined during this inspection

ATTACHMENT

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

M. Barton, Instructor, Operations Training
S. Blake, Manager, Quality Assurance
K. Chambliss, Manager, Operations
T. Chard, Manager, Radiation Protection
J. Christensen, Director, Nuclear Safety Assurance
T. Donovan, Supervisor, Training
R. Edington, Vice President, Nuclear CNO
J. Florence, Supervisor, Simulator
G. Kline, Director, Engineering
J. Roberts, Director, Nuclear Safety Assurance
M. Schauble, Assistant Manager, Operations
G. Smith, Performance Management
J. Sumpter, Licensing
C. Sunderman, Supervisor, Training
D. Tune, Superintendent, Operations Training
D. Vanderkamp, Supervisor, Licensing
J. Waid, Manager, Training
D. Werner, Supervisor, Operations Training

NRC personnel

S. Cochrum, Resident Inspector

LIST OF ITEMS OPENED AND CLOSED

Open

50-298/2004015-01	URI	Simulator Fidelity
50-298/2004015-02	URI	Acceptance Criteria for Simulator Performance Testing

Closed

50-298/2004011-02	VIO	Failure to maintain a systems approach to training led to high failure rates on the biennial requalification examinations (4OA5)

LIST OF DOCUMENTS REVIEWED

Section 1R11
Dynamic Simulator Scenarios

SKL052-52-06
SKL052-52-08
SKL052-52-20
SKL052-52-34

Section 4OA5
Significant Condition Report SCR 2003-1966
Condition Report CR-CNS-2003-7461

Simulator Job Performance Measures

SKL0341093, R02	SKL0342070, R10	SKL0342117, R1	SKL0343024, R2
SKL0342032, R08	SKL0342101, R2	SKL0342127, R1	SKL0344024, R1
SKL0342054, R08	SKL0342112, R1	SKL0342135, R0	SKL0344028, R3

Biennial Written Examinations

04LORRO01	04LORRO04	04LORSRO02	04LORSRO04
04LORRO02	04LORRO05	04LORSRO03	04LORSRO05
04LORRO03	04LORSRO01		

Procedures

SDG1-1	Simulator Work Package	Revision 3
SDG2-1	Simulator Software Controls	Revision 5
SDG4-1	Simulator Performance Testing	Revision 2
NTP5-3	Remediation	Revision 17
NTP7-2	Simulator Configuration Management	Revision 3
OTP805	Requalification Exam Development	Revision 9
OTP808	Open reference Examination Test Item Development	Revision 1
OTP809	Operator Requalification Examination Administration	Revision 9
OTP810	Examination Security	Revision 4

Simulator Configuration Changes from 8/04 to 10/21/04

Production	Training	Load	0401	8/00
"	"	"	0402	2/20/04
"	"	"	0403	3/29/04
"	"	"	0404	5/10/04
"	"	"	0405	5/24/04
"	"	"	0406	8/3/04
"	"	"	0407	8/20/04
"	"	"	0408	10/9/04
"	"	"	0409	10/21/04

Descriptive list of 10 Simulator Enhancement Request by Due Date

Descriptive list of 16 Plant Modifications in the Simulator by in-service date.

Physical Fidelity Report dated 11/15/04

Descriptive list of 30 Simulator discrepancies by due date. Includes about 150 items.

Simulator staffing and organization chart

Schedule, dated 11/4/04 for simulator upgrade.

Lesson Plan-OPS Simulator Introduction-Simulator Discrepancies and Design Changes, Revision 92

List of 2004 Simulator Performance Tests

Notification 10319016, Simulator T/H Analysis Request, dated 6/3/04

Transient 4- Both Recirc Pumps Trip, Revision 4, date performed 10/4/04

Transient 10- MSIV Closure with Stuck Open SRV, Revision 4, date performed 10/7/04

Malfunction- 480V Bus 1E Power Failure, Revision 0, date performed 10/18/04

Malfunction- Safety Valve Spurious Opening, Revision 1, date performed 10/18/04

Malfunction- Control Rod Drift Out, Revision 1, date performed 10/20/04

Malfunction- HPCI Flow Controller Failure, Revision 1, date performed 10/19/04

Surveillance Procedure 6HPCI.201, HPCI Valve Operability Test (IST), Revision 11, dated 9/23/04

Surveillance Procedure 6RCIC.201, RCIC Power Operated Valve Operability Test, Revision 10, dated 9/22/03

Surveillance Procedure 6.1RHR.201, RHR Power Operated Valve Operability Test (IST)(DIV 1), Revision 15, dated 9/21/04

Surveillance Procedure 6.1CS.201, CS Motor Operated Valve Operability Test (IST)(DIV 1), Revision 10, dated 9/22/04

Stability/Accuracy Test, Revision 2, date performed 10/20/04

Normal Plant Evolutions-Mission Test, Revision 5, dates performed 10/22-27/04

Attachment A of Mission Plan, Revision 5

General Operating Procedure 2.1.4, Normal Shutdown, Revision 84, dated 10/27/04

General Operating Procedure 2.1.1, Startup Procedure, Revision 117, dated 10/1/04

Self Assessment SA 0331 Report, Operations Training Focused Self-Assessment

Simulator Performance Review Committee Meeting Minutes for meetings: 2/24/03, 11/3/03, 11/13/03, 3/4/04, 3/19/04, 4/28/04, 7/1/04 and 10/15/04.

Cooper Station Performance Indicators for Training

Nuclear Training Procedure (NTP) 7.5, Simulator Performance Review Committee, Revision 2, dated 3/8/04

Simulator Desk Guide (SDG) 4.1, Simulator Performance Testing, Revision 2, dated 11/14/02

NTP 5.3, Remediation, Revision 17, dated 5/5/04

NTP 7.2, Simulator Configuration Management, Revision 3, dated 2/26/04

Simulator Desk Guide 1.1, Simulator Work Package, Revision 3, dated 1/9/04

Simulator Desk Guide 2.1, Simulator Software Controls, Revision 5, dated 5/20/02

NRC Form 474- Simulator Facility Certification, dated 12/24/98, with Cooper Nuclear Station letter dated 12/30/98 from John H. Swailes to NRC

Report on Benchmarking of Simulator Discrepancies Prepared by Jane Neis, Ginna Nuclear Power Plant, dated 3/02

Current (11/04) list of the number of (1) open work orders, (2) discrepancies, (3) mods, (4) enhancements and (5) “other” from nine plants

LOR Cycle 02-20 feedback for weeks 1 -5

LOR Cycle 01-06 feedback for weeks 2-5

Attachment