



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

February 26, 2002

David L. Wilson, Vice President of
Nuclear Energy
Nebraska Public Power District
P.O. Box 98
Brownville, Nebraska 68321

SUBJECT: COOPER NUCLEAR STATION REGULATORY PERFORMANCE MEETING
SUMMARY

Dear Mr. Wilson:

This refers to the public meeting between NRC and Nebraska Public Power District conducted in Auburn, Nebraska, on February 7, 2002. This meeting was held to discuss your root cause analysis, extent of condition evaluation, self assessments, and corrective actions associated with two White findings at the Cooper Nuclear Station. The findings involved a failure of the emergency response organization to recognize a simulated degraded core condition during an evaluated exercise and again during a later drill, which resulted in issuance of incorrect protective action recommendations for offsite populations.

We found the meeting to be informative in addressing our concerns. As was stated during the meeting, we will inform you by separate correspondence as to the extent of additional inspection which is currently being planned consistent with our Reactor Oversight Process to address these and other Emergency Preparedness Cornerstone issues.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures 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 Reading Room).

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Gail M. Good", is written over the typed name.

Gail M. Good, Chief
Plant Support Branch
Division of Reactor Safety

Docket: 50-298
License: DPR-46

Nebraska Public Power District

-2-

Enclosures:

1. Attendance List
2. Licensee Presentation

cc:

G. R. Horn, Senior Vice President
of Nuclear and Enterprise Effectiveness
Nebraska Public Power District
1414 15th Street
Columbus, Nebraska 68601

John R. McPhail, General Counsel
Nebraska Public Power District
P.O. Box 499
Columbus, Nebraska 68602-0499

D. F. Kunsemiller, Risk and
Regulatory Affairs Manager
Nebraska Public Power District
P.O. Box 98
Brownville, Nebraska 68321

Dr. William D. Leech
Manager - Nuclear
MidAmerican Energy
907 Walnut Street
P.O. Box 657
Des Moines, Iowa 50303-0657

Ron Stoddard
Lincoln Electric System
1040 O Street
P.O. Box 80869
Lincoln, Nebraska 68501-0869

Michael J. Linder, Director
Nebraska Department of Environmental
Quality
P.O. Box 98922
Lincoln, Nebraska 68509-8922

Chairman
Nemaha County Board of Commissioners
Nemaha County Courthouse
1824 N Street
Auburn, Nebraska 68305

Sue Semerena, Section Administrator
Nebraska Health and Human Services System
Division of Public Health Assurance
Consumer Services Section
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509-5007

Ronald A. Kucera, Deputy Director
for Public Policy
Department of Natural Resources
205 Jefferson Street
Jefferson City, Missouri 65101

Jerry Uhlmann, Director
State Emergency Management Agency
P.O. Box 116
Jefferson City, Missouri 65101

Vick L. Cooper, Chief
Radiation Control Program, RCP
Kansas Department of Health
and Environment
Bureau of Air and Radiation
1000 SW Jackson, Suite 310
Topeka, Kansas 66612-1366

Training, Exercises, & Evaluation
Branch Chief
FEMA Region VII
2323 Grand Blvd., Suite 900
Kansas City, Missouri 64108-2670

Electronic distribution from ADAMS by RIV:

Regional Administrator (**EWM**)DRP Director (**KEB**)DRS Director (**ATH**)Branch Chief, DRS/PSB (**GMG**)EP Inspector, DRS/PSB (**REL**)Senior Resident Inspector (**MCH2**)Branch Chief, DRP/C (**KMK**)Senior Project Engineer, DRP/C (**vacant**)Staff Chief, DRP/TSS (**PHH**)RITS Coordinator (**NBH**)Jim Isom, Pilot Plant Program (**JAI**)State Liaison Officer (**WAM**)

DMB (IE35)

RidsNrrDipmLipb

DOCUMENT NAME: S:\DRS\DRSLTRS\CN02-07-02MS-DRS.WPD

RIV:DRS/PSB	C:PSB	D:DRS		
REhantz:nlh	GMGood	ATHowell		
<i>2/19/02</i>	<i>Signed 2/12/02</i>	<i>1/02</i>		

OFFICIAL RECORD COPY

T=Telephone

E=E-mail

F=Fax

ENCLOSURE 1

Cooper Nuclear Station
Regulatory Performance Meeting Attendance
February 7, 2002
Auburn, NE

Kevin Billesbach, QA, NPPD
Beth Borsch, Sr. Manager, Corporate Comm., NPPD Columbus
Loras Baumhover, Sheriff, Nemaha Co.
Greg Casto, Emergency Preparedness Manager, CNS
Tim Chard, Chemistry/RP Manager, NPPD
Michael Coyle, Asst. VP, NMC/CNS
Brent Curtis, REP Planner, NE EMA
Ken Fike, Chemist, NPPD
Jim Flaherty, Site Regulatory Liaison, CNS
Ronald Fraass, Supervisor Env. Rad. & EP, NDHE
Rick Gardner, Sr. Manager, QA, CNS
Charles Garst, Watson Mo.
Jim Genweck, Director, Richardson Co. EMA
Mark Gillan, Work Control Manager, NPPD
Roger Goas, Director, Nemaha Co. EMA
Gail Good, Chief, PSB, NRC Region IV
Michael Hay, Resident Inspector, CNS, NRC Region IV
Guy Horn, Sr. Vice President, NPPD Columbus
Brad Houston, QA Manager, CNS
Art Howell, Director, DRS, NRC Region IV
Jim Hutton, Plant Manager, CNS, NPPD
Don Jagger, Director, Atchison Co. 911
James Kelsay, EP Coordinator, CNS
David Kunsemiller, Manager, Risk & Regulatory Affairs, NPPD
Ryan Lantz, Sr. Emergency Preparedness Inspector, NRC Region IV
Bill Leech, VP-Nuclear, Mid-American Energy
Dave Meyers, Sr. Manager, Site Support, CNS
Gail Rentschler, Atchison Co. 911
David Robinson, QA Manager, NPPD
Ed Rotkvia, Health Physicist, NPPD
Julia Schmitt, Program Manager, Nebraska HHS R&L
Jon Schwarz, Rad. Programs Manager, NE EMA
Steve Sherron, ALARA Engineer, NPPD
Ronald Stoddard, Consultant, LES
Jim Sumpter, Project Manager, Licensing, CNS
Chris Sunderman, RP, NPPD

Nebraska Public Power District

Emergency Preparedness Regulatory Performance Meeting

Cooper Nuclear Station

February 7, 2002

Agenda

- Introduction Dave Wilson
- Timeline and EP Improvement Plan. Dave Meyers
- Past Performance Issues Jim Sumpter
- Self-Assessments Greg Casto
- EP ImprovementsGreg Casto
- Follow-Up Inspection Resolution Greg Casto
- Line Ownership of EP Jim Hutton
- Closing Remarks Guy Horn

Introduction

David Wilson

Timeline

2000

Aug Biennial exercise

Nov Preliminary White finding issued

August drill root cause issued

Dec Final determination (1st White finding)

2001

Apr Supplemental Inspection (1st White finding)

EP Drill

Jun Alert - Voltage transformer failure

April drill root cause issued

Emergency Preparedness Improvement Plan issued

Timeline

2001

- Jul Preliminary 2nd White finding issued
- Aug Final determination (2nd White finding)
USA external self assessment
- Sep White finding root cause issued
- Nov Supplemental Inspection (2nd White finding)

Emergency Preparedness Improvement Plan Development

- Staff-identified improvement opportunities
- Corrective actions from White findings
- Corrective actions from June alert
- Quality assurance audits and escalation letter
- Root cause evaluations
- External assessment

EP Improvement Plan Structure

- Augmentation
- Activation
- Backshift
- Administration
- Assessment
- Corrective Action Program
- Emergency Plan Review
- Management Ownership
- Offsite Programs
- Procedure Issues
- QA Responses
- Regulatory Issues
- Training

Past Performance Issues

- Two (2) NRC White inspection findings
 - Weaknesses in two (2) drills
 - August 2000
 - April 2001

August 2000 Biennial Exercise

- Critique process failed to identify drill issues
 - First White finding
- Failure to identify degraded core and make correct protective action recommendation (PAR) during exercise

Root Cause Evaluations

- Root cause for critique failure (RCR 2000-0912)
 - Lack of performance standard for evaluating dose assessment performance
- Root cause for failure to identify degraded core and make correct PAR determination (RCR 2000-0909)
 - Procedure inconsistencies and lack of procedural guidance for wind shift

Extent of Condition

- Failure to identify degraded core
 - No review conducted
- Critique failure
 - Reviewed other risk-significant drill evaluation areas for performance standards
 - Determined two risk-significant areas also lacked performance standards for drill evaluations
 - Notifications
 - PARS

Corrective Actions - Critique Failure

- Instituted use of performance standards in drill evaluations for areas lacking those standards
- Enhanced evaluator training

Corrective Actions - Failure to Identify Degraded Core

- Resolved procedure inconsistencies
- Developed guidance to address wind shifts
- Conducted training to review drill issues and corrective actions

Status

- Corrective actions completed for both root cause evaluations
- Critique process effective per subsequent drills
- Inadequate critique issue closed in Inspection Report 01-04.

April 2001 Drill

- Failure to identify degraded core and make correct PAR recommendation
- Critique identified drill performance issues

Root Cause Evaluation

- Root cause for failure to identify degraded core and make correct PAR determination (RCR 2001-0331)
 - Teamwork needs improvement
 - Communications
 - Procedure usage
 - Command and control

Extent of Condition

- Reviewed other similar positions in other emergency response facilities for teamwork issues
- No other cases found

Corrective Actions

- Developed objective criteria for teamwork to be used for evaluating drill performance in each emergency response facility
- Conducted immediate training for key emergency response organization members on procedure adherence and degraded core assessment
- Provided additional training on core damage assessment for key emergency response organization members

Second White Finding

- Corrective actions to prevent recurrence of dose assessment weaknesses experienced in August 2000 exercise were not fully effective

Root Cause Evaluation

(SCR 2001-0624)

- Previous root cause evaluations narrowly focused
 - Addressed degraded core
 - Did not address failure to make correct PAR determination
 - No common causes identified
- Re-performed previous root cause evaluations
- Focused on failure to make correct PAR determination
- Results
 - Identified common causes
 - Identified additional causes

Root Causes

- Failure to recognize significance of EP performance issues
- Inadequate guidance in corrective action process concerning significance of EP performance issues

- Inadequate dose assessment and command and control training
- Inadequate drill scenario validation

Extent of Condition

- Found three other performance areas with potential similar weaknesses
 - Physical Protection
 - Radiation Safety
 - NRC Performance Indicators
- Events in these areas appropriately classified in corrective action program

Corrective Actions

- Revised corrective action program procedures
- Provided additional training
 - Importance of risk-significant areas in corrective action program
 - Core damage assessment
 - Command and control
- Improved drill scenario control
- Corrective actions completed

Self-Assessments

2001

- Aug Emergency response facility appraisal
 Utilities Service Alliance assessment
 External peer review
- Sep Emergency plan/regulatory review
- Oct EP program commitment review

2002

- Jan EP management program assessment

Self Assessment Findings

Improvements recommended in:

- Emergency response facilities
- Emergency plan implementing procedures
- Staff augmentation
- Corrective action program backlog
- Training

Significant Accomplishments-2001

- Established and managed a broad based improvement plan
- Demonstrated high level of plant management commitment and on-site support
- Installed additional backup power to emergency response facilities
- Incorporated 2 years of critique data into corrective action program
- Developed work-off plan for corrective action backlog
- Improved drill and exercise manual
- Improved/tested staff augmentation process

Planned Improvements-2002

- Procedures/Training
 - Upgrade Emergency Plan implementing procedures and training to best industry practices
- Drills
 - Nine scheduled
 - Includes player briefs/performance training drills
- Scenario development software
 - Improved program for simulator scenario development, critique trending, major Emergency Plan element tracking
- Emergency response organization (ERO) improvements
 - Additional management assignments to ERO

Performance Measurement

- Revised key performance indicators
 - ERO performance
 - Staff augmentation
 - ERO staffing
- Corrective action program performance
 - Site-wide
 - Departmental

Performance Assessment

- Completion of Improvement Plan milestones
- Drill critiques
- Monthly review of Performance Indicators
- Continued self-assessments
- QA audits and surveillances

Follow-Up Inspection Resolution

- Dose assessment team performance
 - Additional training for dose assessment team complete
- EP corrective action program implementation
 - 2000/2001 drill performance issues entered into corrective action program
 - Recently completed QA surveillance

Follow-Up Inspection Resolution

- Historical research of condition reports
 - Historical search relative to extent of condition documented in SCR 2001-0624
- Self-assessments
 - Root cause evaluations and self-assessments have bounded the issues identified in White findings

Line Ownership

- Organizational commitment is an imperative
- Top ten site wide focus areas includes EP performance improvement
- Additional management personnel assigned key roles

Closing Remarks

Guy Horn