



Nebraska Public Power District
Nebraska's Energy Leader

NLS2002029
June 10, 2002

Ellis W. Merschoff
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive Suite 400
Arlington, TX 76011

Dear Mr. Merschoff:

Subject: Transmittal of The Strategic Improvement Plan (TIP) Revision 1
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

The purpose of this letter is to submit The Strategic Improvement Plan (TIP) Revision 1 for Cooper Nuclear Station (CNS) to the Nuclear Regulatory Commission (NRC). The plan was prepared to address requirements of the NRC Reactor Oversight Process Action Matrix for a plant in the repetitive degraded cornerstone status. CNS entered this status on April 1, 2002. TIP will be used during conduct of the NRC Inspection Procedure (IP) 95003 team inspection due to begin on June 24, 2002.

TIP is a long-term, broad-based plan that contains corrective actions and enhancements that will help lead CNS toward excellence through a phased approach. TIP Revision 1 was developed based on an evaluation of major assessments and improvement plans dating from 1993. Action plans were developed to address the extent of condition and the related causal factors.

TIP is a "living document" subject to revision and updating as future evaluations, assessments and issues dictate. The plan will be completed in phases until it is demonstrated that each action plan has addressed the underlying cause(s) of the stated problems from both an immediate and recurrence prevention perspective. Actions may be added to TIP to ensure the successful outcome of action plans or to address emerging issues.

Prior to CNS entering the repetitive degraded cornerstone status, Nebraska Public Power District (NPPD) had determined that an improvement plan was necessary to focus personnel on immediate improvements in CNS performance. Following the refueling outage in January 2002, CNS management began developing the improvement plan. The initial purpose of TIP Revision 0, issued on April 8, 2002, was to accomplish specific, near term objectives designed to arrest

degrading performance. Evaluation and assessment subsequent to issuance of Revision 0 have resulted in the development of TIP Revision 1, which has broader scope.

TIP Revision 0 initiated improvement actions in a number of focus areas, including:

- (1) Organizational Effectiveness
 - (a) Management Effectiveness
 - (b) Human Performance Fundamentals
 - (c) Corrective Action Program Effectiveness
- (2) Emergency Response Organization Performance
- (3) Operational Focus & Alignment
- (4) Training Program
- (5) Outage Planning and Effectiveness
- (6) On-line Work Management
- (7) Equipment Reliability
- (8) Engineering Programs
- (9) Fiscal Discipline

The results of the previously mentioned evaluation of past major assessments and improvement plans caused CNS management to increase the number of focus areas to 18 in TIP Revision 1. These focus areas have been aligned within the following four "Pillars of Excellence":

- (1) Organizational Excellence
- (2) Operational Excellence
- (3) Equipment Excellence
- (4) Training Excellence.

Benchmarking of other industry improvement and business plans have demonstrated that these Pillars of Excellence generally represent those fundamental areas of plant operation that must be present to sustain top-level performance.

TIP Revision 2 will be submitted after completion of the NRC IP 95003 inspection and will serve as a basis for the anticipated NRC Confirmatory Action Letter. Revision 2 will contain the results of a detailed resource prioritization, estimating, planning and scheduling process. Some start and completion dates in Revision 1 may be adjusted through this process. Revision 2 will also include enhancements from continuing evaluations and additional actions resulting from the NRC inspection and emerging issues. Specific performance improvement objectives or actions contained in Revision 2 will be identified as regulatory commitments. NPPD will submit TIP Revision 2 to the NRC following receipt of the NRC IP 95003 inspection report.

NPPD Quality Assurance will perform ongoing surveillances of TIP implementation throughout the implementation period.

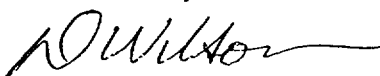
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NPPD and the management of this station are committed to the individual, team and organizational behavior changes necessary to ensure successful results with both TIP and the longer-term transition to excellence in station performance.

Should you have any questions concerning this matter, please contact me at 402-825-2760.

Sincerely,



David L. Wilson
Vice President - Nuclear

/jrs
Attachment

cc: U.S. Nuclear Regulatory Commission
Att: Document Control Desk
Washington D.C. 20555-0001

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS

Correspondence Number: NLS2002029

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
Submit Revision 2 of TIP after completion of the NRC IP 95003 inspection and receipt of the inspection report. Revision 2 will contain the results of a detailed resource prioritization, estimating, planning and scheduling process. Specific performance improvement objectives or actions contained in Revision 2 will be identified as regulatory commitments.	N/A

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ATTACHMENT

The Strategic Improvement Plan, Revision 1

Cooper Nuclear Station
Docket 50-298, License DPR-46

COOPER NUCLEAR STATION

THE STRATEGIC IMPROVEMENT PLAN (TIP)

Revision 1 – June 10, 2002

MISSION STATEMENT

On March 8, 2002, a TIP workshop was held at CNS, attended by management team members and volunteer employees from the Behavior Change Agent Network (B-CAN). The composite team established the following Mission Statement for TIP:

Complete urgent Phase I "Tactical Actions" that will enable the NPPD Board to make a positive business decision to operate CNS past 2004. These actions will:

- *Establish regulatory margin*
- *Maintain or increase nuclear and personnel safety*
- *Meet production and financial goals*

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Letter to Employees and Stakeholders

The purpose of this introductory letter to employees and stakeholders is twofold. The first purpose is to introduce **The Strategic Improvement Plan (TIP) Revision 1**. The second purpose is to again clearly communicate our priorities.

As was stated in the letter that accompanied Revision 0, TIP is our path to future success. One of our major challenges going forward is to align our work efforts around both TIP action plans and the priority corrective actions that are not specifically identified in TIP, but are contained in the corrective action program inventory. It is imperative that we constantly check this alignment by asking, "How does what I am doing today tie in with actions in TIP and other priority work identified in the Corrective Action Program?"

We must also relentlessly challenge and monitor the performance measures identified in TIP, learning to make systematic and timely adjustments if the actions we are taking are not producing the desired results. Our communication and change management efforts over the last several months have been targeted at improving our alignment. Future communication and change management initiatives will be similarly targeted.

As to our priorities, we have talked about the significant effort we are undertaking, and how it could affect our task performance. We want to reiterate that our most important priority is to **operate the plant safely at all times**, using the proven nuclear safety fundamentals and techniques that form the core of our training. This will be done through a strong focus on **operations and human performance**. We must **continue to place our highest priority on the protection of the health and safety of the public**, which is why you will continue to see such a high priority placed on **improving emergency preparedness**.


Improved use of continuous improvement, which includes self-assessment, operating experience, quality assurance and the corrective action program, is at the core of being able to reach sustained high levels of performance. All of the evaluation and assessment work we have done over the past two months, as part of the TIP development process, has pointed to a need for prompt actions to bring our corrective action program implementation up to best industry performance.

As we approach the actions to improve performance, we want to reaffirm our commitment to the right of employees to raise safety issues or concerns, either to or through the supervisory chain up to us or Mr. Mayben, directly to our Employee Concerns Program Coordinator, our Quality Assurance Department, or if needed, to the Nuclear Regulatory Commission. This is a fundamental right in the nuclear business, and should be safeguarded by all of us.

We would personally like to thank you for your work since the first week of April in completing all of the complex evaluation, assessment and development work needed to prepare TIP Revision 1, while continuing to operate the plant safely. We have made some progress in areas like human performance as a result of actions implemented through TIP Revision 0. Similar improvement is required in implementation of the corrective action program.

We welcome any feedback on TIP or on our improvement efforts. We are both proud to be members of the CNS team and look forward to being part of a bright future for Cooper Nuclear Station, our employees and stakeholders.

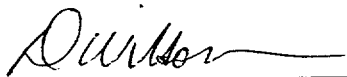

M.T. Coyle
Site Vice President


Dave Wilson
Vice President - Nuclear and Chief Nuclear Officer

AFFIRMATION

The following NPPD and CNS leaders commit to the individual, team and organizational behavior changes necessary to ensure successful results with both the The Strategic Improvement Plan (TIP) and the longer-term transition to Excellence.

The following signatures denote that the subject document is complete and accurate to the best of the signers' knowledge.



D. Wilson
Vice-President and Chief Nuclear Officer



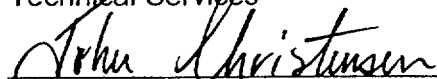
M. Coyle
Site Vice-President



J. Hutton
Plant Manager



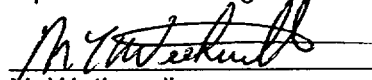
P. Caudill
General Manager - Engineering and Technical Services



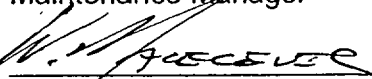
J. Christensen
Nuclear Training Manager



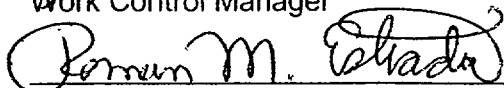
R. Gardner
Operations Manager



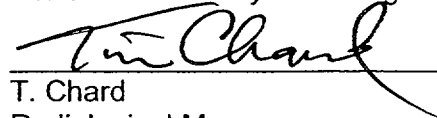
N. Wetherell
Maintenance Manager



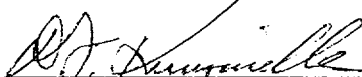
W. Macecevic
Work Control Manager



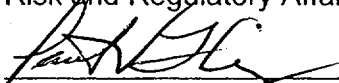
R. Estrada
Performance Analysis Manager



T. Chard
Radiological Manager



D. Kunsemiller
Risk and Regulatory Affairs Manager



P. Fleming
Nuclear Licensing and Safety Manager



K. Sutton
Risk Management Supervisor - Acting



D. Cook
Senior Manager Emergency Preparedness



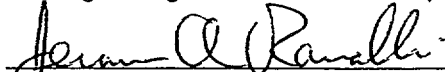
G. Casto
Emergency Preparedness Manager



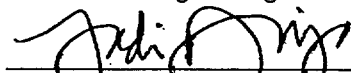
M. Boyce
Senior Manager Technical Services



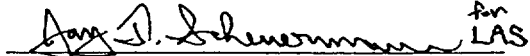
L. Croteau
Manager Organizational Development



J. Ranalli
Senior Manager Engineering

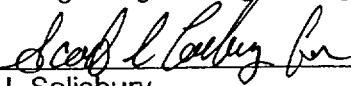


F. Diva
Plant Engineering Manager



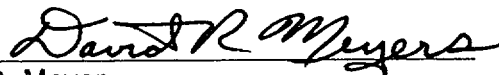
L. Schilling
Administrative Services Manager

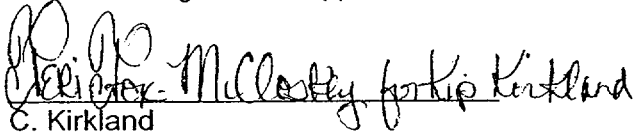

K. R. Jones
Design Engineering Manager

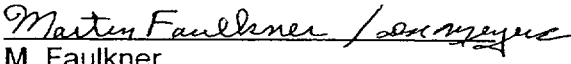

J. Salisbury
Engineering Support Manager


J. Lewis
Fuels and Reactor Engineering Manager

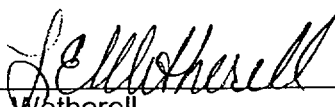

R. Dewhirst
Nuclear Projects Manager – Acting


D. Meyer
Senior Manager Site Support


C. Kirkland
Nuclear Information Technology Manager

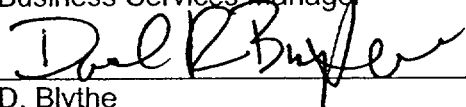

M. Faulkner
Security Manager

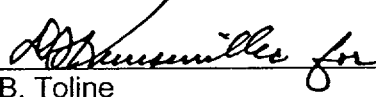

G. Smith
Project Manager


L. Wetherell
Executive Assistant to Vice-President

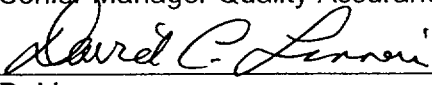

H. Minassian
Material Services Manager


S. Brown
Business Services Manager


D. Blythe
Senior Project Manager - TIP


B. Toline
95003 Inspection Project Manager and
Quality Assurance Audit Supervisor


D. Robinson
Senior Manager Quality Assurance - Acting


D. Linnen
INPO Representative, Rotation – 95003/TIP


J. Fox
Outage Manager