



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION IV  
1600 E LAMAR BLVD  
ARLINGTON, TX 76011-4511

September 2, 2014

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 05000298/2014006)

Dear Mr. Limpias:

On August 14, 2014, the NRC completed its mid-cycle performance review of the Cooper Nuclear Station. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2013 through June 30, 2014. This letter informs you of the NRC's assessment of the Cooper Nuclear Station during this period and its plans for future inspections at your facility.

The NRC determined that overall, the Cooper Nuclear Station was operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at the Cooper Nuclear Station during the most recent quarter was within the Licensee Response Column of the NRC's 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.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 reflect this revision to Inspection Manual Chapter (IMC) 0310, "Aspects Within The Cross-Cutting Areas," dated December 19, 2013. Cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310 during the mid-cycle assessment review and evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305, "Operating Reactor Assessment Program," dated October 18, 2013.

The NRC identified a cross-cutting theme in the human performance area associated with Procedural Adherence. Specifically, the theme consists of four inspection findings in the mitigating systems cornerstone related to individuals follow processes, procedures and work instructions [H.8/WP.4]. The NRC determined that a substantive cross-cutting issue does not

exist because, while there were four inspection findings with this theme, this represented a recent performance trend. Once identified, your staff placed this issue into the corrective action program and is presently developing plans to address this issue. The NRC will continue to monitor your staff's efforts and progress in addressing the theme until the theme criteria are no longer met.

The NRC identified a cross-cutting theme in the human performance area associated with Conservative Bias. Specifically, the theme consists of four inspection findings in the mitigating systems cornerstone related to individuals' use of decision-making practices that emphasize prudent choices over those that are simply allowable. A proposed action is determined to be safe in order to proceed, rather than unsafe in order to stop [H.14/ DM.2]. The NRC determined that a substantive cross-cutting issue does not exist because, while there were four inspection findings with this theme, this represented a continuing reduction in the number of findings with this cross-cutting aspect. The NRC will continue to monitor your staff's efforts and progress in addressing the theme until the theme criteria are no longer met. We expect your staff to frequently review or monitor the effectiveness of the corrective actions for these cross-cutting themes, using appropriate indications of performance, and implement additional actions if the desired performance is not observed.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. 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.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for each site, and will aid staff in development of an ultimate Safety Evaluation for the site. The date for the onsite component at your site is being coordinated with your staff. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

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).

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

Sincerely,

**/RA/**

Donald B. Allen, Chief  
Project Branch C  
Division of Reactor Projects

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

Enclosure: Cooper Nuclear Station  
Inspection/Activity Plan

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Letter to Oscar A. Limpias from Donald B. Allen dated September 2, 2014

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(REPORT 05000298/2014006)

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Distribution via Listserv for Cooper Nuclear Station

**Cooper**  
**Inspection / Activity Plan**  
**09/01/2014 - 12/31/2015**

Unit Number	Planned Dates Start End	Inspection Activity	Title	No. of Staff on Site
		<b>EXAM - INITIAL OPERATOR EXAM</b>		<b>3</b>
1	10/19/2015 10/23/2015	X02547	INITIAL EXAM CNS (12/2015)	
1	10/26/2015 10/30/2015	X02547	INITIAL EXAM CNS (12/2015)	
		<b>71111.08 - INSERVICE INSPECTION</b>		<b>2</b>
1	10/06/2014 10/10/2014	IP 7111108G	Inservice Inspection Activities - BWR	
		<b>RS 13 PI - RADIATION SAFETY</b>		<b>2</b>
1	10/06/2014 10/10/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	10/06/2014 10/10/2014	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1	10/06/2014 10/10/2014	IP 71151-OR01		
1	10/06/2014 10/10/2014	IP 71151-PR01		
		<b>EB1-07T - CNS TRIENNIAL HEAT SINK PERFORMANCE</b>		<b>1</b>
1	02/23/2015 02/27/2015	IP 7111107T	Heat Sink Performance	
		<b>EB1-21T - CNS COMPONENT DESIGN BASIS INSPECTION</b>		<b>7</b>
1	04/06/2015 05/08/2015	IP 7111121	Component Design Bases Inspection	
		<b>RS 12 PI - RADIATION SAFETY</b>		<b>2</b>
1	05/18/2015 05/22/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	05/18/2015 05/22/2015	IP 71124.02	Occupational ALARA Planning and Controls	
1	05/18/2015 05/22/2015	IP 71151-OR01		
1	05/18/2015 05/22/2015	IP 71151-PR01		
		<b>TSB 52B - BIENNIAL PI&amp;R INSPECTION</b>		<b>4</b>
1	06/08/2015 06/12/2015	IP 71152B	Problem Identification and Resolution	
1	06/22/2015 06/26/2015	IP 71152B	Problem Identification and Resolution	
		<b>BRQ - BIENNIAL REQUAL INSPECTION</b>		<b>3</b>
1	08/10/2015 08/14/2015	IP 7111111B	Licensed Operator Requalification Program	
		<b>RS 5678 - RADIATION SAFETY - TEAM</b>		<b>4</b>
1	08/24/2015 08/28/2015	IP 71124.05	Radiation Monitoring Instrumentation	
1	08/24/2015 08/28/2015	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
1	08/24/2015 08/28/2015	IP 71124.07	Radiological Environmental Monitoring Program	
1	08/24/2015 08/28/2015	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
		<b>EP-1 - BIENNIAL EP PROGRAM INSPECTION</b>		<b>1</b>
1	11/02/2015 11/06/2015	IP 7111402	Alert and Notification System Testing	
1	11/02/2015 11/06/2015	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1	11/02/2015 11/06/2015	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	11/02/2015 11/06/2015	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	

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

**Cooper**  
**Inspection / Activity Plan**  
**09/01/2014 - 12/31/2015**

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
EP-2      - EP PERFORMANCE INDICATORS					
1	11/02/2015	11/06/2015	IP 71151-EP01		
1	11/02/2015	11/06/2015	IP 71151-EP02		
1	11/02/2015	11/06/2015	IP 71151-EP03		