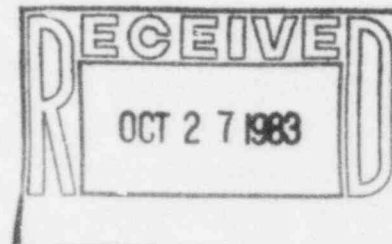




Nebraska Public Power District

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October 24, 1983
LQA8300241



Mr. John T. Collins, Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Reference: (1) Docket No. 50-298/83-23; Systematic
Assessment of Licensee Performance (SALP)

Dear Mr. Collins:

The purpose of this letter is to forward comments as Attachment 1 to this letter in response to the SALP Board conducted August 23, 1983, and the SALP report as jointly reviewed at Cooper Nuclear Station on October 4, 1983.

The Nebraska Public Power District (NPPD) appreciated the straightforward discussion of the SALP topics at CNS. All comments were accepted with the viewpoint that improvement in all areas is possible and highly desirable. The District and the Nuclear Regulatory Commission share a most positive mutual interest in this effort.

The NPPD comments are numbered, titled and presented in the same sequence as the SALP report. It is hoped that our comments will both lend perspective to the SALP report and present evidence of a sincere desire to be in conformance with regulatory requirements and enhance safety in all aspects of CNS operation.

Sincerely,

L. G. Kuncel
Assistant General Manager - Nuclear

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Attachment

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NEBRASKA PUBLIC POWER DISTRICT
COMMENTS TO SALP (NRC REPORT 50-298/83-23)

IV. PERFORMANCE ANALYSIS

A. Plant Operations

The District recognizes the need for additional emphasis on procedure usage, Technical Specification familiarity, staffing and training. General Electric has been contracted to provide an additional three full-time instructors, rewrite the training manual, and the CNS training staff has been authorized to expand to include a department of twelve full-time CNS employees. Classroom training was already being conducted on Technical Specifications prior to the SALP meeting. The Operations Supervisor now meets every week with the operational crew in the training cycle to lend his personal emphasis to procedural compliance and Technical Specification concerns as well as related operational topics of concern. While experience level, retention and expansion of a capable staff are still items of concern, the District is positive the additional emphasis in these areas will achieve noticeably better results in the future.

B. Radiological Controls

1. Radiation Protection

The SALP Board recommendations concerning establishing the ALARA program and closing open items in the radiological controls area are well taken. In the CNS reorganization, the position of ALARA Coordinator was already created prior to SALP and a formal ALARA program will be forthcoming even though, as noted in the SALP report, CNS exposure for 1982 was 542 man-Rem as compared to the 1982 BWR national average of 940 man-Rem. Additional health physics technicians have been hired and are in training.

NPPD has purchased a Cooper Training Project from General Electric (GE) which provides Chemistry/Health Physics instruction in order to accomplish the following objectives:

- a. Develop Cooper Site specific training material in Chemistry and Health Physics. Development of this material would meet Cooper Nuclear Station's need for training material for teaching chemistry and health physics. Development of Chemistry/Health Physics training material for Cooper Nuclear Station's technicians is to be accomplished two years after the start date of October 31, 1983.

- b. Formulate a formal training program for Cooper Nuclear Station plant personnel in Health Physics and Chemistry. The training program will provide the required training courses for plant management, engineers, operators and technicians.
 - c. Provide instruction in Chemistry and Health Physics for Cooper Nuclear Station Health Physics/Chemistry technicians.
2. Radwaste Systems, Effluent Releases, Effluent Monitoring
- No comment. The District will pursue monitoring the consistently high performance noted in this area.
3. Transportation Activities and Solid Radwaste
- No comment.
4. Confirmatory Measurements, Chemistry/Radiochemistry and
5. Environmental Surveillance

An effort is being made to close open items. This should become evident in future inspections. Increased staffing is now available.

C. Maintenance

Additional emphasis is being placed on the need to review and follow approved maintenance procedures and instructions. As facilities (classrooms, offices) become available, the recently authorized instructor positions in the training department can be utilized more effectively.

D. Surveillance

Additional emphasis has already been placed on the evaluation of and correction of plant valves in order to pass local leak rate testing. The full-time position of Outage Coordinator has been established. Three maintenance personnel are attending an INPO maintenance training course on Limitorque valves.

The new CNS station management is very aware of the potential problem with the recent Local Leak Rate Test (LLRT) results. The Plant Engineering Supervisor is developing a program to trend the results of the LLRT. This program will be used to order the necessary spare parts (or entire valves) and to evaluate the effectiveness of current repair procedures. Implementation is scheduled prior to the 1984 outage.

E. Fire Protection

No comment.

F. Emergency Preparedness

Analysis:

"Results from the emergency appraisal follow-up indicated two significant areas not adequately addressed: Personnel training and dose assessment for control room operators."

Response:

Stone and Webster Engineering Corporation (SWEC) developed the existing Emergency Planning Training Manual (EPTM). The development of the EPTM was done in 1982 as a means to satisfy 10CFR50 Appendix E. The EPTM contains course objectives, lecture materials, and quizzes. The manual serves as guidance for the instructor in basic outline form. The District recognizes that in its present form, the EPTM is not adequate.

Currently, SWEC has been contracted to provide NPPD with an EP Training Program which is more comprehensive and which will include training at both CNS and the General Office. This new Training Program will include the following:

1. Evaluation of the Emergency Plan functional requirements and staffing considerations to confirm, or appropriately modify, the Emergency Plan Training Matrix.
2. Provide a detailed syllabus, or training plan, which identifies specific lessons, drills, and activities necessary to meet the training requirements set forth in the Training Matrix.
3. Develop a set of Master Lesson Plans, including Performance Objectives, to execute the Training Plan. Included are overhead transparencies, 35mm slides, wall charts, etc.
4. Design and development of diagnostic tests - two sets of quizzes.
5. Provide instructor training.

The estimated time of completion of this task is February 1, 1984.

A procedure for initial dose assessment by the Control Room Operators (CRO's) was developed in 1982 by CNS personnel as Part C. of EPIP 5.7.17. Although this was a relatively simple method of determining initial offsite dose assessment, it was not used as effectively as it could have been.

The resulting action of an NRC unannounced inspection in this area was the purchase of three pocket computers and the development of a simplified, user-friendly computer program that will allow the CRO to input various meteorological data and radiological release data from the recently installed Kaman Command Units to determine the initial offsite dose rates and make possible recommendations to the appropriate offsite authorities.

This task is being completed at this time and the appropriate training is scheduled to be completed in the near future.

Analysis:

"NPPD has also been slow in revising their Emergency Plan to reflect the guidance criteria in NUREG-0654."

Response:

The Emergency Plan is currently being revised in conjunction with SWEC. The items mentioned in the Emergency Plan Appraisal Report from NRC dated February 17, 1983, are being addressed in the current revision of the Emergency Plan.

The major item that is holding up the completion of this revision is the reorganization of the Nuclear Group at the General Office level. Many of the participants in the old General Office Emergency Organization are not part of the present Nuclear Group and several of the newly-created positions have not been filled at both the General Office and CNS. When this item has been completed, the Emergency Plan revision can proceed.

Analysis:

"NPPD staffing of the emergency preparedness program during this period was minimal."

Response:

In the past, NPPD has utilized the services of various consulting firms to help in the planning and development of the drills and exercises. This practice has provided for the training of those individuals employed by the consulting firm, and therefore, that learning situation has been lost to a number of NPPD personnel. Although permanent Emergency Planning Coordinators have been established at both the General Office and CNS, the District is considering additional positions in this area.

G. Physical Security

Additional emphasis has been placed on security in the CNS reorganization. Improvements are planned, particularly to accommodate the loop replacement project which will leave CNS with enhanced security facilities.

H. Refueling

The increased emphasis on Technical Specification awareness has already been discussed. The Reactor Engineering group will revise the methodology for control blade swapping/replacement to reduce the probability of error. All control blade operations will be performed late in the refueling and as a separate part of refueling. No fuel movement will be allowed while control blade swap/replacement is in progress. This action may increase the number of steps for fuel movement, but this is acceptable to prevent a recurrence of moving fuel when not all control rods are inserted in the core.

I. Licensing Activities

Timeliness of response will greatly improve as the nuclear organization settles in and the backlog of training and staffing requirements are met.

J. Training

NPPD has purchased the Cooper Training Project from GE which includes the following:

1. Provides a GE Training Manager with the duties of identifying the specific training needs of Cooper Nuclear Station to support development of a Cooper specific training program, supervision of all General Electric instructors assigned to Cooper Nuclear Station, creation of a training policy and procedures manual defining the responsibilities of training department personnel and specifying the conduct of training, and establishing an auditable training documentation procedure. His duties shall include responsibility for the following training areas:
 - a. STA Training
 - b. General Employee Training
 - c. Licensed Operator Requalification Program
 - d. Non-licensed Operator Training
 - e. Licensed Operator Initial Training
 - f. Health Physics and Chemistry Training
 - g. Maintenance and I&C Training
2. Provide two SRO certified training instructors who will:
 - a. Conduct on site portions of the STA training program with the exception of Mechanical and Nuclear Training supported courses.
 - b. Conduct the General Employee Training Program and revise General Employee Training material.
 - c. Conduct Non-licensed Operator and Staff training and develop student texts and instructor guides.
 - d. Conduct Licensed Operator Requalification Program and develop student texts and instructor guides.
 - e. Beginning in 1984, develop student texts and instructor guides for Licensed Operator Training and assist Cooper Nuclear Station personnel in conducting Licensed Operator instruction.

- f. Other material development as directed by the Training Manager.

In summary, additional training is being emphasized very strongly.

K. Management Controls

The District concurs in the staff's conclusions in this area and District management will maintain vigilance over corporate and site changes to ensure a smooth yet complete transition of organizational responsibilities and authority such that safety is enhanced and not degraded.

L. Quality Assurance

Conclusion:

"Several NRC Inspections have indicated that site located QA Auditors do not possess adequate technical expertise, background, or experience to perform in-depth technical reviews of operational and environmental procedures."

Response:

Since the appraisal period, and as a result of the recent NPPD reorganization, the CNS QA staff has been authorized several new positions. It is anticipated that one of the new positions will be filled with a licensed operator. This action will provide the CNS QA staff with an individual with experience and background to perform quality reviews on Operational Procedures. In addition, consideration is being given to drawing on the technical expertise of the District's Environmental Affairs Department for future audits in the environmental area. It is also anticipated that the CNS QA staff will participate in the plants specific training being conducted at the station; i.e., Health Physics, Chemistry, and Systems Training.

It is felt that by taking the aforementioned steps, the CNS QA staff will attain the experience and background to relieve the concerns expressed.

M. Summary

The District is earnestly striving towards increased performance in all areas specified in the SALP report; however, the complexities associated with the various transition programs underway may require a period of greater than a year before the techniques of the new organization can be further objectively analyzed.

COOPER NUCLEAR STATION
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Enclosure 3

NPPD ATTENDEES

Don Schaufelberger, General Manager
Larry Kuncel, Assistant General Manager-
Nuclear
Jay Pilant, Technical Staff Manager-
Nuclear Group
Keith Wire, Operations Manager-
Nuclear Operations Division
Dave Whitman, Technical Staff Manager-
Nuclear Operations Division
John Meacham, Technical Manager-
Nuclear Operations Division
Jeff Weaver, Manager, Licensing and
Nuclear Safety
Verne Wolstenholm, CNS Quality
Assurance Manager
Jerry Sayer, Assistant to Technical
Manager
Bob Beilke, Training Manager
Bob Brungardt, Operations Supervisor
Paul Ballinger, Reactor Engineering
Supervisor
Don Norvell, Maintenance Supervisor
Bob McDonald, Chemistry and Health
Physics Supervisor
Gene Mace, Plant Engineering
Supervisor
Harlan Jantzen, Instrument & Control
Supervisor

USNRC ATTENDEES

John T. Collins, Regional Administrator,
Region IV
James Gagliardo, Director, Division
of Resident, Reactor Project and
Engineering Programs, Region IV
Domenic B. Vassallo, Chief, Operating
Reactors Branch #2, Division of
Licensing, NRR
Glen L. Madsen, Chief, Reactor Project
Branch 1, Region IV
Doyle M. Hunnicutt, Chief, Reactor
Project Section A, Region IV
Byron L. Siegel, Licensing Project
Manager, NRR
Dennis L. Dubois, Senior Resident
Inspector, Cooper Nuclear Station