



## Nebraska Public Power District

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NSD920178  
February 14, 1992

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

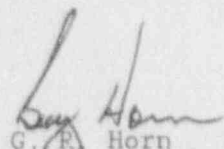
Gentlemen:

Subject: NPPD Response to Inspection Report 50-298/92-01

This letter is written in response to your letter dated January 27, 1992 transmitting Inspection Report 50-298/92-01. Therein you identified four (4) weaknesses in our emergency preparedness program observed during an inspection conducted at Cooper Nuclear Station on January 6-10, 1992. The attachment to this letter contains a description of our corrective measures for the weaknesses noted and our schedule for completing these actions.

Should you have any questions concerning this response, please contact me.

Sincerely,



G. P. Horn  
Nuclear Power Group Manager

/rg  
Attachment

cc: Regional Administrator  
USNRC - Region IV

NRC Resident Inspector  
Cooper Nuclear Station

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Statement of Weakness 298/9201-01

The emergency classification of accident conditions was identified as an exercise weakness.

Corrective Action Taken

Immediate corrective actions involved retraining the three operating crews observed by the NRC on the same scenario used during the inspection. The crews were also reevaluated, using the same format as NRC Inspection Module 82206, on a scenario similar to the one used in the original inspection. The retraining and reevaluation of these crews were completed January 11-12, 1992. Retraining and evaluation for the remaining three operating crews were completed prior to the resumption of their on-shift duties. The completion date was January 17, 1992.

Senior Operations and Training Management were present for all the training and evaluation periods. Their presence assisted in determining the root causes for the performance errors.

The root cause of this weakness was determined to be less than adequate training in EALs under dynamic conditions.

Planned Corrective Action

The planned corrective actions include enhancing classroom EAL training and dynamic simulator emergency response training as part of the licensed operator requalification training program.

Schedule of Implementation

The initial round of dynamic simulator training will be completed by July 1, 1992.

Statement of Weakness 298/9201-02

Failure to make complete and accurate notifications was identified as an exercise weakness.

Corrective Action Taken

Immediate corrective actions involved retraining the three operating crews observed by the NRC on the same scenario used during the inspection. The crews were also reevaluated, using the same format as NRC Inspection Module 82206, on a scenario similar to the one used in the original inspection. The retraining and reevaluation of these crews were completed January 11-12, 1992. Retraining and evaluation for the remaining three operating crews were completed prior to the resumption of their on-shift duties. The completion date was January 17, 1992.

Senior Operations and Training Management were present for all the training and evaluation periods. Their presence assisted in determining the root causes for the performance errors.

The root causes of this weakness were determined to be a procedure inadequacy and an incorrect task assignment.

#### Planned Corrective Action

Subsequent corrective actions include revising EPIP 5.7.6 "Notification" to streamline the notification form and reassigning responsibilities for completing the form. The responsibility to complete the form will be assigned to the Shift Communicator. The Emergency Director will be responsible for review and signature of the form.

Enhanced dynamic simulator emergency response training for operating crews will also be implemented to address this weakness.

#### Schedule of Implementation

The EPIP 5.7.6 revision is expected to be approved by March 1, 1992.

The initial round of dynamic simulator training will be completed by July 1, 1992.

#### Statement of Weakness 298/9201-03

The performance of dose assessments was identified as an exercise weakness.

#### Corrective Action Taken

Immediate corrective actions involved retraining the three operating crews observed by the NRC on the same scenario used during the inspection. The crews were also reevaluated, using the same format as NRC Inspection Module 82206, on a scenario similar to the one used in the original inspection. The retraining and reevaluation of these crews were completed January 11-12, 1992. Retraining and evaluation for the remaining three operating crews were completed prior to the resumption of their on-shift duties. The completion date was January 17, 1992.

Senior Operations and Training Management were present for all the training and evaluation periods. Their presence assisted in determining the root causes for the performance errors.

The root causes of this weakness were determined to be a procedure inadequacy; no procedural cues were available to guide operators with respect to core degraded or not degraded, and human miscue; the operator knew the core was degraded yet entered "no" into the dose assessment program.

#### Planned Corrective Action

Subsequent corrective actions include revising EPIP 5.7.17 "Dose Assessment" to provide specific cues for the "core degraded" entry into the dose assessment program.

Enhanced dynamic simulator emergency response training for operating crews will also be implemented to address this weakness.

#### Schedule of Implementation

The EPIP 5.7.17 revision is anticipated to be approved by March 1, 1992.

The initial round of dynamic simulator training will be completed by July 1, 1992.

Statement of Weakness 298/9201-04

The formulation of protective action recommendations was identified as an exercise weakness.

Corrective Action Taken

Immediate corrective actions involved retraining the three operating crews observed by the NRC on the same scenario used during the inspection. The crews were also reevaluated, using the same format as NRC Inspection Module 82206, on a scenario similar to the one used in the original inspection. The retraining and reevaluation of these crews were completed January 11-12, 1992. Retraining and evaluation for the remaining three operating crews were completed prior to the resumption of their on-shift duties. The completion date was January 17, 1992.

Senior Operations and Training Management were present for all the training and evaluation periods. Their presence assisted in determining the root causes for the performance errors.

The root causes of this weakness were determined to be a procedure inadequacy, the automatic Protective Action Recommendation (PAR) for General Emergency was not specified as an immediate action, and human miscue, evacuating upwind sectors.

Planned Corrective Action

Subsequent corrective actions include revising EPIP 5.7.5 "General Emergency" to make the automatic baseline General Emergency PAR an immediate operator action.

Enhanced dynamic simulator emergency response training for operating crews will also be implemented to address this weakness.

Schedule of Implementation

The EPIP 5.7.5 revision is anticipated to be approved by March 1, 1992.

The initial round of dynamic simulator training will be completed by July 1, 1992.