

35

~~DOCUMENT NOT FOR PUBLIC DISCLOSURE~~

[John M. Meacham
Senior Manager, Nuclear Projects]
Nebraska Public Power District
P. O. Box 499
Columbus, NE 68602-0499

December 12, 1994

Mr. James Lieberman
Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: NRC Demand For Information

Dear Mr. Lieberman:

By letter dated November 10, 1994, Mr. Joseph R. Gray, Deputy Director, Office of Enforcement, forwarded to me a copy of a Demand for Information ("the Demand") that was sent to the Nebraska Public Power District ("the District"). Mr. Gray noted that since the Demand was directed towards actions in which I appear to have been involved, I was being provided an opportunity to respond directly to the Demand. The comments made in this response are my opinions, and not necessarily those of the District. I believe that in material respects, my positions are consistent with the positions of the District; however, ensuring that consistency was not my focus. This is a candid discussion of my views on the matters raised by the NRC and I request that any concerns regarding NRC positions be considered by the NRC to be constructive criticism.

X In August 1993, and again in December 1993, I was interviewed by Mr. Daniel Gietl of the NRC's Office of Investigations. On November 23, 1994, the District, with my concurrence, requested a copy of the NRC transcript from that interview. This transcript was received on December 2, 1994. X To the best of my ability, I have concluded that information provided herein is in all material respects consistent with my previous interview with the NRC. If you believe that apparent inconsistencies exist, I request the opportunity to clarify any such matters. Also, please incorporate, by reference, X my "Interview Notes" in a report titled "Investigation Regarding Changes to Vessel Disassembly Procedures," prepared by the District's Office of the General X

Counsel and Winston & Strawn. It is my understanding that these notes were provided to the OI investigator and a copy is attached for your convenience.

I would like to take this opportunity to note to the NRC that I have been involved in the nuclear industry since 1970 (resume attached). I have been involved in the commercial use of nuclear power for electrical production since 1975. With over twenty years of involvement in this industry, I have always conducted myself in a responsible, conscientious manner. I have demonstrated unmitigated respect for Federal Regulations and their application to the operation of nuclear facilities, and I have never, before now, been challenged on my regard for requirements and regulations during performance of my job duties and associated responsibilities. I take the NRC's allegations regarding my integrity very seriously and consider them a challenge to my reputation, competence, and abilities. While I acknowledge that, in hindsight, I may not have managed situations or personnel as well as desired on some occasions, the labeling of my actions as careless disregard is inappropriate. I do not make these statements without significant forethought and care. I ask that the NRC consider my statements as respectful criticism. They are made as a brief expression of my emotions regarding this event and in an attempt to ensure that the NRC clearly understands what questionable accusations of the type provided in the Demand can do to an individual's livelihood and reputation.

I respectfully request that as the NRC reviews my letter, an attempt be made by the reviewer to place himself/herself in my position at the time, and understand what considerations enter a commercial nuclear facility senior manager's mind when decisions must be made. I believe that it would be unreasonable for the NRC to set precedent which expects a senior manager to be personally responsible for remembering every document applicable to every deliberation of a potential safety issue. I believe that a manager must understand and utilize documents which provide the overall intent regarding a situation, and provide essential information to the decision-making process. In the subject instance, I considered all necessary documents and requirements, and stand by my decision given the circumstances at the time. In sum, my actions should not be considered careless disregard, and notwithstanding whether the NRC determines that a violation of technical specifications occurred, I sincerely believe that I adequately performed my regulatory responsibility, and satisfied my managerial obligations.

Summary of Duties In March 1993

To place my March 1993 activities in perspective, I believe it is appropriate to briefly review my duties and responsibilities at that time. Please note that as Site Manager, I was not an official member of the Station Operations Review Committee ("SORC"). My involvement in SORC was as an occasional observer, and seldom did I become very involved in the day-to-day activities of that organization. My

involvement usually was as a SRAB member or SRAB Chairman. However, attendance by me was not unexpected at SORC meetings. I do not believe that the SORC attendees were adversely affected or influenced by my attendance. In fact, SORC members had no problem challenging proposed changes at any of the SORC meetings which I attended.

From a broad perspective, Cooper Nuclear Station ("CNS") Technical Specification 6.1.2, dated March 11, 1993, describes my responsibilities as Site Manager as being the overview and coordination of Plant Manager activities (who is responsible for overall safe unit operation and who has control over those onsite activities necessary for safe operation and maintenance of the plant) and activities by the Senior Manager of Site Support (who is directly responsible for supporting the safe and efficient operation of the plant by providing direction for training, outage and modification coordination, station security, and administrative support). See Technical Specification 6.1.2, Paragraphs B.1 and B.2.

My Job Description at the time stated that I was responsible for: (a) providing administrative guidance to the Plant Manager and the Senior Manager of Site Support, (b) overseeing and directing, from a management perspective, work activities of the Nuclear Operations Division, (c) overseeing and directing the work activities of the Site Support Department to ensure, in part, the efficient scheduling, conduct, and successful completion of station outages, and (d) exercising management responsibility for station access control, station security, emergency response, and public relations in the local area.

Frame-of-Mind Prior to March 1993 SORC Meeting

I believe it is appropriate to provide you with a description of events that occurred prior to the March 1993 SORC meeting so that you can better understand my frame-of-mind during that meeting. Once you are fully aware of this background information, I believe that the NRC would agree that based on my knowledge of other information, all necessary documents were considered during the performance of my duties as Site Manager on March 10, 1993.

Prior to the March 10, 1993, meeting I was aware of several relevant events, documents, and past practices.

GE PRC 88-11

I was aware that General Electric ("GE") had provided a report that recommended additional procedural and possibly technical specification precautions for the movement of loads over irradiated fuel. Although the GE report did not specifically note limitations in its discussion of loads, it was my understanding (right

or wrong) that the GE report was focused on unanalyzed loads -- that is, loads not previously addressed by analyses such as NUREG-0612.

I was aware that the District had performed a review of the GE report and had provided recommended changes to procedures and technical specifications. It was my belief (right or wrong) that these changes were focused on unanalyzed loads.

NUREG-0612

It was, and still is my belief that NUREG-0612 provided all the "analysis" necessary for loads discussed within the context of that document (this includes the reactor vessel head and upper internals). This "analysis" was in the form of a single failure-proof crane. Once it was determined that CNS has such a crane, certain loads, including the reactor vessel head and upper internals, were not viewed as having the potential to damage irradiated fuel. I viewed the NRC's acceptance of the District's single-failure-proof reactor building crane analysis (in response to NUREG-0612) as adequate analysis for loads within its scope. I continue to believe that this is consistent with industry practice and that my actions were consistent with the NRC's SER on NUREG-0612. I would consider a change in what that SER grants to be a material change in NRC position which would have required additional regulatory action.

NRC Project Manager Memorandum

I became aware of the W. O. Long (NRR Project Manager for CNS) memorandum dated March 28, 1988, shortly after it was made available to the District (I do not recall the exact date). I was very aware that the scenario described in the Long memorandum was substantially similar to the scenario that was faced by CNS in March 1993. Throughout SORC deliberations on March 9, 1993, I kept the NRC memo in mind as confirmation that the actions we were taking were acceptable from a technical specification and regulatory perspective. (I do not believe that the NRC's Demand gave full consideration of the impact of a memorandum from an NRR Project Manager who has clearly stated that he was stating the NRC's position on the record.)

The impact of Mr. Long's memorandum was that it indicated to CNS that any procedural changes that we made to limit the movement of heavy loads (covered by NUREG-0612) when secondary containment was not available were at our discretion. Mr. Long clearly stated that a secondary containment test (and, therefore, confirmation of secondary containment) was not required until immediately prior to moving irradiated fuel. I acknowledge that I was aware that Mr. Long also had commented that it would be "prudent" to perform the test prior to head lift, but in no way implied that this was the regulatory position. In that same light, I would not expect a technical specification to contain significant requirements that exceed

regulatory requirements. Therefore, as I discuss later, I did not consider Amendment 147 to be significant in this matter because I never believed it was focused on lifting the reactor head and upper internals -- only unanalyzed loads. However, plant procedures sometimes exceeded regulatory requirements. Again, I did not believe that the NRC would address as a regulatory compliance issue, the addition or removal of "above and beyond technical specification" procedural requirements.

Past Practices at CNS

Although I did not have specifics at the time, I was aware that CNS had lifted the vessel head and upper internals on several prior occasions without establishing secondary containment. I believed that lifting the vessel head and upper internals without secondary containment had occurred before and after the GE PRC report was issued, and was based on the acceptability to the NRC of the NUREG-0612 response. Therefore, it was not a concern to me that a change would be made to an "above and beyond" procedure to allow that evolution to again occur. I have later confirmed that lifting the head and upper internals without secondary containment occurred on many prior occasions. Certainly, with this in mind, this issue is not isolated, and there was no overriding desire by CNS to get on with refueling and carelessly circumvent procedures in the process. Placing the plant in a more stable cold shutdown condition was my primary objective.

Industry Practices

Although I was not aware of specific practices by other similar plants, I was generally aware that other facilities did not view it as a regulatory violation to lift the vessel head and upper internals prior to establishing secondary containment. At the time, an informal survey was conducted of like-BWRs and my recollection is that about half of them disassembled the vessel without having verified that secondary containment is intact.

Technical Specification Changes 147 and 150

As I discuss in further detail below, I was familiar with the content of, and the purpose of, Amendment 147. It was (and is) my position (since I was directly involved, I should know better than an investigator many years later), that the amendment was not intended to address heavy loads already analyzed by NUREG-0612. It was focused on unanalyzed loads that had not been previously considered for potential damage to irradiated fuel. I acknowledge that the amendment was not as clearly worded as it might have been in this particular regard. However, I personally knew what the words were intended to mean.

Frame-of-Mind During SORC Meeting

I attended the earlier SORC meeting (there were two meetings on this issue on the same day) with the understanding that primary containment was not established and that the safest plant condition would be to flood-up. The earlier meeting was held to determine the scope of, and bases for, the changes that were anticipated. Once I was satisfied with the anticipated scope and bases, I did not believe that it was necessary to be present for the actual procedural change approvals. I discovered afterward, however, that during the later session, the scope of anticipated actions was expanded by allowing the removal of the moisture separator. While its removal may not be relevant to the NRC's concerns, it was of concern to me since I viewed the moisture separator as being the last line of defense for potential fuel damage from "unanalyzed loads."

I do not recall that I was aware during the SORC meeting that detensioning had already occurred. In any case, my actions were not production oriented to force the plant to get on with defueling. I was aware during the meeting that primary containment was relaxed and that the plant was in a reduced inventory condition with high decay heat, a reduced complement of Emergency Core Cooling System (ECCS) capabilities due to local leak rate testing, and that flooding up was not possible (not because of detensioning, which I do not recall being aware had occurred, but because the head was still on the vessel). Therefore, my actions were a sincere effort to satisfy my safety concerns by placing the plant in the best status possible under the circumstances. I am very clear in my own mind on the safety motive behind my actions.

Response to NRC Demand for Information

For ease of presentation, I have responded below to the NRC's statements made in the Demand For Information regarding my actions prior to and during the March 1993, SORC meeting. The numbers below correspond to the statements that begin on page 7 of the NRC's Demand.

1.

The CNS Site manager, who was the SORC Chairman in 1991, had presided over the meeting that added the requirement to the vessel disassembly procedures to establish secondary containment integrity prior to moving the RPV head, dryer, and separator. Therefore, he knew or should have known that TS Amendment 147 added the requirement to maintain secondary containment integrity while moving loads in the secondary containment which could potentially damage irradiated fuel.

The Demand is correct in stating that I was the SORC Chairman in 1991 during the meeting that added the requirement to the vessel disassembly procedures (Procedure 7.4.4) to establish secondary containment integrity prior to moving the RPV head, dryer, and the moisture separator. However, the NRC does not appear to recognize that in this capacity, I was in the best position to understand the basis for, and intent of, TS Amendment 147 regarding events that occurred in March 1993.

The vessel disassembly procedure revisions were a result of GE PRC 88-11. The procedure added a prerequisite to have secondary containment prior to head lift. As I discuss further below, this prerequisite was in excess of the intent of Amendment 147. Therefore, changing the prerequisite, even subsequent to the issuance of Amendment 147, was not considered by me to be a regulatory matter. Also, it should not go unnoticed that the procedure prerequisite occurred before the Amendment was proposed. In my mind, there was no direct connection between the two. With these things in mind, I felt comfortable deleting the prerequisite, and did not view such deletion as being inconsistent or in conflict with existing technical specifications. Again, the motivation was to achieve a more stable cold shutdown condition.

Notwithstanding the limited relationship between Amendment 147 and the procedure prerequisite, I believe that it would be useful for the NRC to hear my views on Amendment 147. In sum, Amendment 147 was not clearly worded. Unfortunately, this left significant room for interpretation, extrapolation, and misunderstanding regarding its intent. As I recall, Amendment 147 was proposed, in part, in response to GE's Potentially Reportable Condition ("PRC") 88-11, "PRC 88-11 Mode 4 Technical Specification System Inoperability," dated October 17, 1988, (and as previously stated, not in response to the procedure prerequisite). GE recommended that licensees evaluate and confirm whether adequate procedural, hardware, and analysis precautions had been taken regarding movement of loads over irradiated fuel if secondary containment or operability of the Standby Gas Treatment System (SGTS) were in question.

While during the 1993 SORC meeting, I did not have specific recollection of the exact details of the District's response to the GE PRC, I was generally aware of its content. During my recent review of my actions, I re-reviewed the District memorandum dated December 7, 1988, from R. W. Foust, Assistant Operations

X Engineering Supervisor to P. L. Ballinger, Operations Supervisor X In sum, the memorandum recommends a procedure change to suspend movements of any loads over irradiated fuel with a loss of secondary containment integrity or SGTS inoperability. See Memorandum at p. 3. I noted the use of the term "any." A review of the memorandum in total convinces me that "any" was not meant to include all loads.

My present reading of that memorandum reminded me of my long-standing interpretation of discussions of heavy load movements over irradiated fuel which, in my mind, inserts the word "unanalyzed" into the statement. In other words, I did not then (and do not now) believe that the District or GE intended to supersede NUREG-0612, which provided that certain loads (including the vessel head and upper internals) could safely be moved over irradiated fuel if, as one option, a single failure proof crane was used. It continues to be my belief that GE provided the PRC to inform licensees that loads which previously had not been "analyzed" or controlled pursuant to NUREG-0612 should receive additional consideration regarding potential impacts on health and safety.

I was very aware that the NRC had previously approved the District's actions in response to NUREG-0612 and agreed with the District that its crane was single failure proof. Therefore, for a certain class of loads addressed by NUREG-0612, the NRC already had determined that additional analysis need not be performed. Any licensee action to apply additional limitations to heavy load travel was beyond the regulatory requirement. With these thoughts and beliefs in mind, I considered Amendment 147 to be an attempt to capture those unanalyzed loads that had not been addressed through NUREG-0612 evaluations -- the same loads that I believed (and believe) were being addressed by GE in its 1988 correspondence to the District.

My beliefs are captured by statements used in the modified technical specification (per Amendment 147) and the NRC's Safety Evaluation Report on the Amendment. The revised Technical Specification 3.7.C.1.d (proposed Technical Specification page 166) refers to loads which could potentially damage irradiated fuel and prohibited their movement without secondary containment. Similarly, the NRC's SER, Section 2.0, "Evaluation," notes that activities involving the movement of loads which have the potential to damage irradiated fuel were the focus of the change. I never lost the thought that NUREG-0612 clearly indicated that if a utility had a single-failure-proof crane, those loads handled by that crane encompassed by the NUREG-0612 "analysis" did not have the potential to damage irradiated fuel. I believed then, and continue to believe, that was a logical and reasonable approach to the issue.

In sum, I do not specifically recollect considering the document labeled Amendment 147 on March 10, 1993, during the SORC meeting. However, I did consider (as did SORC), the language of Technical Specification 3.7.C.1.d that was added by Amendment 147. Based upon my subsequent review of Amendment 147,

if I had specifically considered it, I would have likely concluded that it was not germane since it did not contradict the proposed action, and only addressed unanalyzed loads -- an issue that did not apply to movement of the reactor vessel head and upper internals.

- X 2. Notwithstanding the CNS Site Manager's attendance at the March 9, 1993, SORC meeting at which the PCNs, including the annotations that the PCNs involved a change to the TS and that TS Amendments 147 and 150 were documented in Section 5 of the PCNs, were discussed, the CNS Site Manager told the NRC investigator that he did not observe the PCN notations about Amendments 147 and 150. X

As stated above, consideration of Amendment 147 would not have altered my conclusion regarding the acceptability of actions taken during the March 10, 1993, SORC meeting. Furthermore, if I had directly considered Amendment 150, it would have further convinced me that SORC actions were appropriate. As best I can recall, the District, as well as the NRC, recognized that a statement in Section 4.7.C of the CNS Bases could cause confusion regarding heavy load movement restrictions. Therefore, in Amendment 150 the unclear statements were removed in an attempt to prevent inappropriate application of the specification. In other words, Amendment 150 actually supported the proposed change to the vessel disassembly procedure. Amendment 150 was consistent with my first-hand understanding of the intent of the GE PRC and CNS technical specification intent. Therefore, whether or not I observed notations about Amendments 147 and 150 does not appear to be supportive of a conclusion that I carelessly disregarded regulatory requirements.

- X 3. The CNS Site Manager was the most senior NPPD manager onsite in March 1993, and he had many years of operations experience at CNS. On the basis of his knowledge and experience, which included his direct involvement with TS Amendment 147, he should have, in his oversight role at the March 9, 1993, SORC meeting, ensured that the SORC members either reviewed or discussed the relationship among TS Amendment 147, TS Amendment 150, and TS 3.7.C.1.d. X

Please see previous discussions for my response to this assertion.

Conclusion

In conclusion, I request that the NRC consider my frame-of-mind at the time in its consideration of whether I carelessly disregarded regulatory requirements. I do not

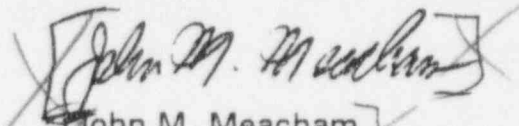
believe that my actions were wrong, and certainly do not believe that they rise to this level of misconduct. I acknowledge that it was imprudent management action to allow the reactor pressure vessel head to be detensioned before it was clear that everything was in place to continue with the next step of disassembling the vessel and flooding up. We clearly should not have allowed the plant to get into that situation. As the chief manager on site during that effort, I am accountable for that management deficiency. However, I believe that this is the limit of my culpability. I may not have performed as well as I could have, but I did not carelessly disregard regulations. Please contact me at the above address if you have any additional questions or require clarification of any information that I have provided.

Attachments:

- 1) Interview Notes
- 2) Resume

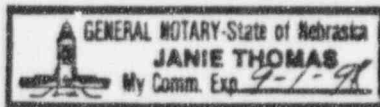
I affirm that this letter is true and correct to the best of my knowledge and belief. In addition, I hereby request that this letter be withheld from placement in the NRC Public Document Room and from disclosure pursuant to 10 C.F.R. § 2.790.

Sincerely,


John M. Meacham

Sworn to and subscribed before me this 12th day of Dec., 1994


Notary Public



My Commission Expires:

9-1-98

ATTACHMENT 1

~~CONFIDENTIAL~~

INTERVIEW NOTES

Interviewee: John Meacham
Date Interviewed: September 1, 1993
Position: CNS Site Manager

1. John Meacham ("JM") explained that as Site Manager he was involved in the March 9, 1993 PCN. He was not a SORC member at the time but did participate in some of the SORC deliberations regarding the PCN.

2. JM emphasized that the PCN was not production oriented, but rather was necessary to put the plant into a safer condition. Specifically, JM explained that on March 9 the plant was in a reduced inventory condition with high decay heat and was unable to flood up. He further explained that a shutdown condition with reduced inventory is probably the time of greatest risk for a BWR. He believes that at the time some ECCS components had also been removed from service for local leak rate testing. Once the RPV head and dryer are removed, then the vessel can be flooded up.

3. When vessel disassembly was held up (due to the inability to verify secondary containment integrity), JM reviewed the situation. Specifically he considered why the procedure change had been made in 1991 to require verification of secondary containment integrity as a prerequisite to lifting the head. JM recalls that the 1991 PCN was initiated by Brent Moeller based on PRC 88-11. The PRC concern was with movement of a load that could damage irradiated fuel. JM recalls that Moeller was asked to obtain an evaluation from Engineering as to what such loads would be. It was his recollection that Engineering could not specify particular load limits. CNS thus took a conservative approach in the 1991 PCN of precluding movement of any loads, which included vessel disassembly.

4. In hindsight, JM observed that the 1991 PCN was developed mid-cycle without thinking through carefully the impact on outage activities. He further explained that this PCN for the first time added procedure requirements to test secondary containment prior to vessel disassembly. He noted that CNS had operated for 18 years without such a procedural requirement.

5. With respect to Technical Specification Amendment 147, JM explained that the Tech Spec change was primarily to address the reactor building vent radiation monitors, which are utilized in

fuel handling accident scenarios. JM recalled that during SRAB consideration of Tech Spec Amendment 147, Guy Horn indicated that he wanted to include words in the Technical Specification on movement of loads (which were incorporated into TS 3.7.C). He is not sure why Mr. Horn wanted to include such a change but believes that the intent was to address any loads carried over the spent fuel pool or loads (such as a beam) moved over the reactor vessel after the head was off. He does not believe that the words were added to TS 3.7.C to address vessel disassembly. JM indicated he had no objection to adding this change to TS Amendment 147 since the provision was very conservative in his view. JM noted that his recollection of the purpose of TS Amendment 147 is supported by the fact that the amendment addressed the reactor building vent radiation monitors, which are credited for fuel handling accidents only.

6. JM remembers that in considering TS Amendment 147 SRAB discussed whether specific loads of concern could be specified -- e.g., 150 pounds or greater. However, SRAB decided that they could not quantify the specific load of concern, and therefore chose the conservative route of precluding movement of all loads with the potential to damage irradiated fuel. He recalled no direct relationship between the 1991 PCN regarding Maintenance Procedure 7.4.4 and TS Amendment 147.

7. With respect to the SORC meeting on March 9, 1993, JM recalled that Jim Flaherty brought in NUREG-0612 for SORC to review. SORC's conclusion was that secondary containment integrity does not need to be verified prior to vessel disassembly since those activities are adequately controlled by the CNS response to NUREG-0612. He noted that NUREG-0612 treats as single-failure proof the lifting of the vessel head and upper internals, so that dropping of these three components is not a credible scenario. JM also recalled that SORC considered TS 3.7.C and concluded that the intent of the Technical Specification was to control movement of loads over the spent fuel pool or loads such as a beam over the vessel after head removal. He noted, in this connection, that the vessel head, separator and dryer are all components addressed by NUREG-0612. He recalls that SORC did not discuss the need to contact the NRC, stating that the question did not arise.

8. At the SORC meeting on March 9, 1993 JM also recalled that SORC considered the Tech Spec interpretation docketed by NRC Project Manager Bill Long, as well as the record of telecon with General Electric. He noted that the telecon record bolstered SORC's independent verification of the purpose and intent of PRC 88-11 and NUREG-0612.

9. It was JM's understanding that the SORC decision on the PCN meant that vessel disassembly would proceed as in previous

outages. JM explained that in 1988 there had been discussions with Mr. Horn and Rick Bennett regarding the vessel disassembly process. At that time, CNS decided that the head could be lifted and the dryer removed but that the separator would be left in until after the vessel was flooded up. JM was surprised to learn after March 9, 1993 that the separator had also been removed along with the vessel head and dryer. He expressed displeasure regarding this to the Plant Manager (Rick Gardner); however, he did not believe that the actions presented a technical problem, although it was not necessarily the most prudent action to take. He noted that Rick Gardner had not been in on the discussions in 1988 among Horn, Meacham and Bennett, and therefore was probably unaware of the decision reached at that time.

10. JM stated that, in his view, the fact that the 1991 PCN took 11 months to process, as opposed to one day for the 1993 PCN, is not relevant. He indicated that outage procedures (such as Maintenance Procedure 7.4.4 on vessel disassembly) are not focused on during the operating cycle. The priority during operation is on any necessary changes to operating procedures.

11. JM expressed the view that the provision in TS 3.7.C on movement of loads does not apply to vessel disassembly for two main reasons. First, a pre-analyzed load, such as one covered by NUREG-0612, does not come within the provision since there would not be the potential to damage irradiated fuel. Second, other loads, due to factors such as weight or configuration, could be precluded as not having the potential to damage irradiated fuel. He noted that during the March 9, 1993 SORC meeting, disassembly of the vessel was considered a pre-analyzed load under NUREG-0612, so that it would not come within TS 3.7.C.

12. With respect to the indication on the March 9, 1993 PCN that a TS change was required, JM noted that this indication was obviously in error since SORC would have insisted on having an approved TS revision before considering the procedure change. Nevertheless, JM indicated that he would not have signed the form, since he felt it had been improperly completed in indicating that a TS change was required.

13. JM agreed with the conclusion that the PCN did not require a 10 C.F.R. § 50.59 evaluation, since the PCN did not involve a change to a procedure described in the USAR.

ATTACHMENT 2

~~X~~ JOHN MONROE MEACHAM ~~X~~

PROFESSIONAL EXPERIENCE SUMMARY

~~X~~ Nebraska Public Power District (August 1994 to Present), General Office
(1983 to July 1994), Cooper Nuclear Station

Stone & Webster Engineering Corporation (1980-1983), Project Manager, Denver Operations Center

General Physics Corporation (1977-1980), Project and Department Manager

Illinois Power Company (1975-1977), Mechanical Quality Assurance Engineer, Clinton Nuclear Station Project

U.S. Navy (1970-1975), Nuclear Trained Officer - Submarines ~~X~~

EDUCATION

~~X~~ B.S., United States Naval Academy (1970)

Graduate Courses in Nuclear Engineering, University of Illinois, Champaign, Illinois

Graduate of Institute of Nuclear Power Operations Senior Nuclear Plant Management Course

Graduate of the University of Michigan Public Utility Executive Program ~~X~~

LICENSES AND REGISTRATIONS

~~X~~ Professional Engineer - Illinois and Nebraska

Senior Reactor Operator - Cooper Nuclear Station (Licensed 1984, Expired 1986)]

EXPERIENCE DETAILS

COOPER NUCLEAR STATION

~~X~~ Appointments:

Senior Manager, Nuclear Projects - August 1994

Senior Nuclear Division Manager of Safety Assessment - October 1993

Site Manager - July 1992

Division Manager of Nuclear Operations (Plant Manager) - June 1990

Senior Manager of Operations - May 1989

Senior Manager of Technical Support Services - October 1986

Technical Manager - June 1983

Engineering Supervisor - March 1983 ~~X~~

Senior Manager, Nuclear Projects

Represent the Vice President, Nuclear in dealings with outside entities and perform special projects, as assigned by him. Examples of such projects include the development of a cost control plan for the Nuclear Power Group, the creation of an advisory group to oversee all Nuclear Power Group activities and report to the Board of Directors and senior management, and involvement in the establishment of a nuclear utility alliance to share resources. Routine duties include serving as the corporate point of contact for the Nuclear Energy Institute, and as the company focal point for dealings associated with low level and level radioactive waste. I was recently assigned to a long-term, three man task force, which reports directly to the company president, to establish the strategy, goals, and process for potentially re-engineering the company.

Senior Nuclear Division Manager of Safety Assessment

Provided the management focal point for nuclear safety at Cooper Nuclear Station (CNS), including responsibility for all oversight activities. Reported directly to the Vice President - Nuclear located on site.

The primary duties and responsibilities of the subject position were to:

- 1) Provide guidance to the Vice President - Nuclear regarding the station's compliance with management's expectations towards safety.
- 2) Maintain a working relationship with the Nuclear Regulatory Commission (NRC) to keep the NRC staff fully informed of NPPD's programs and plans to maintain the highest level of nuclear safety at CNS.
- 3) Oversee and direct the work activities of the Technical Staff to ensure that Licensee Event Reports, Operating Experience Reviews, and other technical reports related to nuclear safety were accurate and responsive to regulatory requirements, and that the Corrective Action Program was responsive to the needs of site management and corrected the root causes of undesirable events.
- 4) Oversee and direct the work of the Industry Advisory Group to ensure NPPD kept abreast of the rising standards of performance in the nuclear industry.
- 5) Oversee and direct the work activities of the Safety Review and Audit Board to meet Technical Specifications requirements and to provide a broad overview of all activities related to nuclear safety.

Site Manager

Reported directly to the Nuclear Power Group Manager, located at the corporate offices in Columbus, Nebraska, on all issues and concerns related to onsite activities at CNS. The Site Manager functioned as the on site management focal point, and was the senior on site management position. The Plant Manager and Senior Manager of Site Support reported directly to me, and, at his discretion, the Radiological Manager could chose to interface with me directly, dependent on the criticality of the issue.

Division Manager of Nuclear Operations

Held the overall responsibility for the safe, reliable, and efficient operation of Cooper Nuclear Station (CNS). Responsible for maintaining compliance with requirements of the Operating License and Technical Specifications. Served as the chairman of the Station Operations Review Committee (SORC) to ensure the nuclear safety associated with the day-to-day operation of CNS, and as the Emergency Director in accordance with the CNS Emergency Plan. In the area of administrative control, was responsible to assure CNS was adequately staffed and trained, and was responsible for budgeting of finances for the safe and efficient operation of CNS. In addition, I was instrumental in creating a revised site organization to sharpen the focus of NPPD's Nuclear Power Group to support site activities.

Senior Manager of Operations

Served as the management focal point for all operations, maintenance, and radiological activities at CNS. Station Managers of these functional areas reported directly to me. Automatically assumed the duties of the SORC Chairman and Emergency Director in the event of the absence of the Division Manager of Nuclear Operations.

Senior Manager of Technical Support Services

Served as the management focal point for activities concerning systems engineers; shift technical advisors; technical support for the Maintenance, Operations, and Radiological departments; plant performance monitoring; station computer hardware and software; outage scheduling and coordination; maintenance contractor administration; security; administrative support; fire protection; operating experience review; and station corrective action programs. The Technical Staff Supervisor and the Station Department Managers of the noted functional areas reported directly to me.

Technical Manager

Had overall responsibility for station radiological and engineering activities. The Station Department Supervisor of these respective disciplines reported directly to me. Obtained Senior Reactor Operator License.

Engineering Supervisor

Provided management overview of all station engineering and computer applications functions for the maintenance and operation of CNS. Was responsible for specifying the manner of station operation for maximum economic benefits within the limits imposed by the Technical Specifications.

STONE & WEBSTER ENGINEERING CORPORATION, DENVER, COLORADO

Appointments:

Project Manager - October 1981

Assistant Project Manager - September 1980

Cooper Nuclear Station, Nebraska Public Power District

As Project Manager, was directly responsible for direct client interface and the engineering of tasks for Cooper Nuclear Station, which included TMI-related back fit items (post accident sampling system, containment high range radiation monitors, and extended range ventilation effluent monitors), modifications to satisfy ATWS requirements, FSAR update, clean water fire protection system study, scram discharge volume modifications, off-gas system modification study, electric boiler addition, emergency plan update, and torus temperature monitoring system addition. In this position, had responsibility for direction of each task, including scope definition, establishment of budget and schedule, providing costs and schedule control, staffing and reporting of progress. Became a Registered Professional Engineer in the State of Nebraska.

GENERAL PHYSICS CORPORATION, COLUMBIA, MARYLAND

As Information Systems Department Manager, responsibilities included managing both corporate group and field projects. Corporate group maintained the corporate Prime computer and peripherals, performed software development and maintenance, conducted systems analysis, wrote programmer and user documentation, and developed in-house applications programs, including user training. Field projects at Nebraska Public Power District and Niagara Mohawk Power Corporation. Furnished expertise to power plants (fossil and nuclear) and utility corporate offices in the areas of plant maintenance and configuration management.

ILLINOIS POWER COMPANY, DECATUR, ILLINOIS

As Mechanical Quality Assurance Engineer, responsibilities included conducting quality assurance audits of all aspects of nuclear power plant design and construction, generating quality assurance/administrative control procedures, and reviewing technical/procurement specifications. This work involved direct interface with utility, architect-engineer, NSSS, and construction organizations. Was also instrumental in developing the Operational Quality Assurance Manual for Illinois Power and the Clinton Nuclear Power Station. Became licensed as a Registered Professional Engineer in the State of Illinois.

NUCLEAR SUBMARINE FORCE, U.S. NAVY

As a Naval Officer, served aboard the nuclear submarine USS GEORGE BANCROFT (SSBN-643). I was assigned the following engineering department billets: Assistant Chief Engineer, Main Propulsion Assistant, Chemistry and Radiological Controls Officer. Duties included supervision, operation, and maintenance of a submarine nuclear power plant. In 1974, was awarded a Type Commander Commendation for professional achievement as Main Propulsion Assistant. Qualified as Engineer Officer, EOOW, EDO, CDO, OOD, DO, and in Submarines.