



## Nebraska Public Power District

COOPER NUCLEAR STATION  
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NLS970025  
February 3, 1997

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

Gentlemen:

Subject: Response to Letter Regarding  
Recurring Performance Deficiencies in the  
Licensed Operator Requalification Program

Reference: 1. Letter to Horn (NPPD) from Gwynn (USNRC) dated January 2, 1997, "NRC  
Inspection Report 50/298/96-16"

By letter dated January 2, 1997, (Reference 1), the NRC requested that Nebraska Public Power District (District) respond to recurring performance deficiencies and the actions taken to address individual performance deficiencies as discussed in Section O5.4b of the subject inspection report. This letter, including Attachment 1, constitutes the District's reply to the requested information.

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

Sincerely,

P. D. Graham  
Vice President of Nuclear Energy

/cct  
Attachment

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ADD: NRR/DRCH/HOLB 1/1

ICD 1/1

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February 3, 1997

Page 2 of 2

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

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REPLY TO REFERENCED DEFICIENCIES  
COOPER NUCLEAR STATION  
NRC DOCKET NO. 50-298, LICENSE DPR-46

During NRC inspection activities conducted from December 2-12, 1996, deficiencies were identified in regard to the CNS licensed operating requalification training program. The particular deficiencies and the District's reply are set forth below:

Identified Deficiency

*"the inspectors identified recurring performance deficiencies in crew command, control, communication, and procedure usage skills. The inspectors identified an apparent weakness in the program's ability to effectively maintain operator performance at expected levels so that previously identified performance deficiencies and weaknesses did not reappear..."*

Reason for Deficiency

Long term remedial changes have been less than adequate because training methods have focused disproportionately on near term corrective actions.

Corrective Steps Taken and the Results Achieved

Operations management has reviewed weaknesses observed during the annual requalification exam and has discussed expectations regarding these weaknesses with the crews as they progress into their training cycle. Operations management has also observed operator conformance with expected practices in the control room to ensure effectiveness in that environment.

Further Corrective Actions That Will Be Taken

The CNS simulator training environment will be changed from focusing on evaluation-based training to a coaching and mentoring training methodology. Emphasis will be toward interactive training to promote expectations in command and control, communications, procedure compliance, and attention to detail.

The effectiveness of this change will be assessed as an integral part of the weekly crew training cycle critique. Observation by management and supervisors will provide another level of evaluation of these instructional techniques.

Identified Deficiency

*"...the inspectors shared the licensee's concerns that the licensed reactor operator who failed on individual competencies may not be competent to continue to perform license duties. The inspectors requested that the NRC be kept informed of the final remedial disposition of this operator before returning him to licensed duties, or of a decision to terminate the license."*

District Response

A remediation plan has been developed and is being implemented for the remediation of this individual. A series of examinations culminating in a remedial annual requalification exam will be given at the conclusion of the process expected to be completed in approximately six months. Successful completion of the remediation process will be reviewed by the Operations Manager, Plant Manager, and Vice President - Nuclear who will provide the final decision for our communication to the NRC of the District's planned action regarding the license.

Successful completion of this remediation process is not being considered as the sole criteria for a decision regarding the future of this license but is an input to the decision. Individual behaviors such as attitude, conservative decision making, and self motivation as well as improvements in the individual's integrated system knowledge will also be considered.

Correspondence No: NLS970025

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
Successful completion of the remediation process will be reviewed by the Operations Manager, Plant Manager, and Vice President - Nuclear who will provide the final decision for our communication to the NRC of the District's planned action regarding the license.	