



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-4005

March 2, 2006

Randall K. Edington, Vice
President-Nuclear and CNO
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

SUBJECT: ANNUAL ASSESSMENT LETTER - COOPER NUCLEAR STATION (NRC
INSPECTION REPORT 05000298/2006001)

Dear Mr. Edington:

On February 7, 2006, the NRC staff completed its performance review of Cooper Nuclear Station (CNS). Our technical staff reviewed performance indicators for the most recent quarter and inspection results for the period from January 1 through December 31, 2005. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include physical protection information. A separate letter designated and marked as "Official Use Only - Security-Related Information" will include the physical protection review and resultant inspection plan.

Overall, CNS operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for the most recent quarter was within the Licensee Response column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all performance indicators indicating performance at a level requiring no additional NRC oversight (Green). Although plant performance was within the Licensee Response column, the significance of a finding resulting from our special inspection of a service water strainer clogging event that occurred on October 20, 2005, is still under review as part of the Significance Determination Process which, when finalized, may change our assessment of your plant's safety performance.

While plant performance for the most recent quarter is within the Licensee Response column of the Action Matrix, CNS was in the Regulatory Response Column of the NRC's Action Matrix at the beginning of this assessment period. This was based on one finding of low to moderate significance (White) in the Mitigating Systems Cornerstone. This finding involved a significant number of licensed operator requalification written examination failures. A supplemental inspection conducted by the NRC determined that your root cause, extent of condition and cause, and associated corrective actions were appropriately performed to address the deficiencies noted in the CNS operator requalification program. As a result, this finding was closed in NRC Inspection Report 05000298/2004015, dated March 16, 2005.

In our midcycle assessment letter dated August 30, 2005, we advised you that the substantive crosscutting issue in the area of human performance would remain open based on the number of findings identified across several cornerstones and the impacts that this performance deficiency had on plant operations. We indicated that focused NRC oversight of this area through baseline inspections would continue until CNS's actions were effective in improving the level of procedural adherence. Based on our review of inspection results for the period from January 1 through December 31, 2005, the NRC has concluded that this substantive crosscutting issue can be closed. These inspection results are documented in the 2005 baseline inspection reports. Although the NRC continued to identify inspection findings in the area of human performance, we noted improvement in the level of procedural adherence at CNS and that you adequately addressed the basis for opening this substantive crosscutting issue. Additionally, CNS began developing a performance improvement plan in the latter part of the assessment period to further improve performance in this area.

In our midcycle assessment letter dated August 30, 2005, we advised you that the substantive crosscutting issue in the area of problem identification and resolution would remain open based on the NRC's continuing identification of inspection findings related to inadequate corrective actions resulting in repetitive problems which impacted plant operation. We indicated that focused NRC oversight of this area through baseline inspections would continue until CNS's actions were effective in preventing repetitive or similarly recurring problems that significantly impact plant performance.

Based on our review of inspection results for the period from January 1 through December 31, 2005, the NRC has concluded that this substantive crosscutting issue will remain open. A recurring theme, which also has been documented in previous NRC assessments, involves inadequate corrective actions resulting in repetitive problems which impact plant operation. During this assessment period, there were nine Green findings involving problem identification and resolution, eight of which involved the causal factor of corrective action. Findings in the Barrier Integrity, Initiating Events, Mitigating Systems, and Occupational Radiation Safety cornerstones related to this crosscutting area were identified. Examples included the failure to take adequate corrective actions to prevent recurrence of the failure of safety-related motor-operated valve motor starters, the failure to properly address the root cause of operating the reactor in excess of licensed thermal power, the failure to correct repeated occurrences of placing the high pressure coolant injection auxiliary oil pump switch in pull-to-lock following a reactor scram, and the failure to promptly correct degraded conditions affecting a service water booster pump.

There has been a substantive crosscutting issue in this area for several assessment periods and improving problem identification and resolution at CNS was the subject of an NRC Confirmatory Action Letter and a CNS Performance Improvement Plan. Despite the extensive focus in this area, consequential plant issues continue to occur at CNS. To address problems in this area, your staff began developing an additional performance improvement plan in the latter part of the assessment period; however, the implementation effectiveness has not yet been assessed.

Because there has been a substantive crosscutting issue in the area of problem identification and resolution for more than two consecutive assessment letters, you are requested to provide a written response within 30-days of the date of this letter describing your assessment of performance and your plans to improve performance in this area. Following our review of your response, we will schedule a public meeting with you to discuss this issue. Focused NRC oversight of this area through baseline inspections will continue until our inspections indicate that your actions have been effective preventing repetitive or similarly recurring problems that significantly impact plant performance.

The enclosed inspection plan details the inspection, except those related to physical protection, scheduled through September 30, 2007. The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last 9 months of the inspection plan are tentative and may be revised at the midcycle review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made 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).

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Mr. Kriss Kennedy at (817) 860-8144 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Arthur T. Howell III, Director
Division of Reactor Projects

Docket: 50-298
License: DPR-46

Enclosure:
Cooper Nuclear Station Inspection/Activity Plan

cc w/enclosure:

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RidsNrrDirslpab

SUNSI Review Completed: _kmk_ ADAMS: Yes No Initials: _kmk_
 Publicly Available Non-Publicly Available Sensitive Non-Sensitive

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RIV:C:DRP\C	D:DRS	D:DRP	RA	
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/RA/	/RA/	/RA/	/RA/	
2/24/06	2/24/06	2/27/06	2/28/06	

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Cooper
Inspection / Activity Plan
03/01/2006 - 09/30/2007

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
	EB1-2/17 - PERMANENT MODS/50.59		3			
1	IP 7111102	Evaluation of Changes, Tests, or Experiments		04/17/2006	04/21/2006	Baseline Inspections
1	IP 7111117B	Permanent Plant Modifications		04/17/2006	04/21/2006	Baseline Inspections
	EXAM - INITIAL EXAMINATION		5			
1	X02344	COOPER - INITIAL EXAM (11/06)		09/11/2006	09/15/2006	Not Applicable
1	X02344	COOPER - INITIAL EXAM (11/06)		10/02/2006	10/13/2006	Not Applicable
1	X02344	COOPER - INITIAL EXAM (11/06)		10/16/2006	10/20/2006	Not Applicable
	BRQ SIM - BIENNIAL RQ SIM ONLY		1			
1	IP 7111111B	Licensed Operator Requalification Program		05/01/2006	05/05/2006	Baseline Inspections
	EB2-12B - MAINTENANCE RULE BIENNIAL		1			
1	IP 7111112B	Maintenance Effectiveness		05/08/2006	05/12/2006	Baseline Inspections
	REQUAL - REQUALIFICATION		2			
1	IP 7111111B	Licensed Operator Requalification Program		06/12/2006	06/16/2006	Baseline Inspections
	EB2-07B - HX PERFORMANCE		1			
1	IP 7111107B	Heat Sink Performance		06/26/2006	06/30/2006	Baseline Inspections
	EP1 - EMERG PREPAREDNESS EXERCISE		3			
1	IP 7111401	Exercise Evaluation		07/17/2006	07/21/2006	Baseline Inspections
1	IP 7111404	Emergency Action Level and Emergency Plan Changes		07/17/2006	07/21/2006	Baseline Inspections
1	IP 71151	Performance Indicator Verification		07/17/2006	07/21/2006	Baseline Inspections
	RP-ORS - OCCUPATIONAL RADIATION SAFETY		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		10/16/2006	10/20/2006	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		10/16/2006	10/20/2006	Baseline Inspections
1	IP 71151	Performance Indicator Verification		10/16/2006	10/20/2006	Baseline Inspections
	RP-ORS - OCCUPATIONAL RADIATION SAFETY		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		10/30/2006	11/03/2006	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		10/30/2006	11/03/2006	Baseline Inspections
	RP-ORS - OCCUPATIONAL RADIATION SAFETY		1			
1	IP 7112101	Access Control to Radiologically Significant Areas		03/19/2007	03/23/2007	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		03/19/2007	03/23/2007	Baseline Inspections
1	IP 71151	Performance Indicator Verification		03/19/2007	03/23/2007	Baseline Inspections
	EB2-05T - TRIENNIAL-FP		5			
1	IP 7111105T	Fire Protection [Triennial]		05/21/2007	05/25/2007	Baseline Inspections
1	IP 7111105T	Fire Protection [Triennial]		06/11/2007	06/15/2007	Baseline Inspections
	RP TEAM - RADIATION SAFETY TEAM		5			
1	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		05/14/2007	05/18/2007	Baseline Inspections

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

Cooper
Inspection / Activity Plan
03/01/2006 - 09/30/2007

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
RP TEAM - RADIATION SAFETY TEAM			5			
1	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		05/14/2007	05/18/2007	Baseline Inspections
1	IP 7112202	Radioactive Material Processing and Transportation		05/14/2007	05/18/2007	Baseline Inspections
1	IP 7112203	Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control Pr		05/14/2007	05/18/2007	Baseline Inspections
EP2 - EP PROGRAM			1			
1	IP 7111402	Alert and Notification System Testing		07/23/2007	07/27/2007	Baseline Inspections
1	IP 7111403	Emergency Response Organization Augmentation Testing		07/23/2007	07/27/2007	Baseline Inspections
1	IP 7111404	Emergency Action Level and Emergency Plan Changes		07/23/2007	07/27/2007	Baseline Inspections
1	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		07/23/2007	07/27/2007	Baseline Inspections
1	IP 71151	Performance Indicator Verification		07/23/2007	07/27/2007	Baseline Inspections
EB2-52B - PIR TEAM INSPECTION			5			
1	IP 71152B	Identification and Resolution of Problems		07/16/2007	07/20/2007	Baseline Inspections
1	IP 71152B	Identification and Resolution of Problems		07/30/2007	08/03/2007	Baseline Inspections
EB1-21 - CDB			7			
1	IP 7111121	Component Design Bases Inspection		08/27/2007	08/31/2007	Baseline Inspections
1	IP 7111121	Component Design Bases Inspection		09/10/2007	09/21/2007	Baseline Inspections
RP-ORS - OCCUPATIONAL RADIATION SAFETY			1			
1	IP 7112101	Access Control to Radiologically Significant Areas		09/10/2007	09/14/2007	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		09/10/2007	09/14/2007	Baseline Inspections
1	IP 71151	Performance Indicator Verification		09/10/2007	09/14/2007	Baseline Inspections