



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005**

August 27, 2003

Clay C. Warren, Chief Nuclear Officer  
Nebraska Public Power District  
P.O. Box 98  
Brownville, Nebraska 68321

**SUBJECT: MIDCYCLE PERFORMANCE REVIEW AND INSPECTION PLAN -  
COOPER NUCLEAR STATION**

Dear Mr. Warren:

On August 7, 2003, the NRC staff completed its midcycle plant performance assessment of Cooper Nuclear Station. The midcycle review for Cooper Nuclear Station involved the participation of all technical divisions in evaluating performance indicators (PIs) for the most recent quarter and inspection results for the first half of the current assessment cycle, January 1 through June 30, 2003. 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 so that you will have an opportunity to prepare for these inspections and to inform us of any planned inspections that may conflict with your plant activities.

Plant performance for the most recent quarter remains in the Multiple/Repetitive Degraded Cornerstone column of the NRC's Action Matrix based on a degraded Emergency Preparedness Cornerstone that existed for more than four quarters. Cooper Nuclear Station entered the Multiple/Repetitive Degraded Cornerstone column of the NRC's Action Matrix on April 1, 2002. The White findings that contributed to the repetitive degraded cornerstone were identified during the 2000 and 2001 assessment periods and were described in the annual assessment letters dated May 29, 2001, and March 4, 2002.

Upon entry into the Multiple/Repetitive Degraded Cornerstone Column of the Action Matrix, and with oversight by the NRC, the Nebraska Public Power District (NPPD) developed a plan to improve performance at Cooper Nuclear Station. On June 10, 2002, NPPD submitted Revision 1 of The Strategic Improvement Plan to the NRC. On August 22, 2002, the NRC completed a supplemental inspection using Inspection Procedure 95003, "Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input." Following completion of the NRC supplemental inspection, NPPD revised its improvement plan and submitted Revision 2 of the plan to the NRC on November 25, 2002. On January 30, 2003, NRC issued a Confirmatory Action Letter to NPPD. The purpose of the Confirmatory Action Letter was to confirm the commitments made by NPPD regarding completion of those actions in the improvement plan developed to address regulatory performance issues. Licensee actions confirmed in the Confirmatory Action Letter addressed long-standing performance issues in the areas of emergency preparedness, human performance, material condition and equipment reliability, plant modification and configuration

control, corrective action program, and engineering programs. The NRC is performing periodic inspections to verify completion of these actions and the effectiveness of these actions in addressing the specific performance issues. Two of these inspections were completed during the first two quarters of 2003. Cooper Nuclear Station will remain in the Multiple/Repetitive Degraded Cornerstone Column of the Action Matrix until the satisfactory completion of the actions listed in this Confirmatory Action Letter and NPPD has demonstrated sustained improvements in plant performance.

In our annual assessment letter dated March 4, 2003, we advised you of substantive crosscutting issues in the areas of Problem Identification and Resolution and Human Performance. Performance in these areas continues to be of concern based on the inspection findings identified during the first two quarters of 2003. Your improvement plan provides for specific actions to address these areas. These activities and any changes resulting from these activities will be reviewed during the scheduled quarterly inspections of the actions described in the Confirmatory Action Letter and as part of the baseline inspection program.

The enclosed inspection plan details the inspections scheduled through September 30, 2004. In addition to the baseline inspections, quarterly inspections to verify the actions taken with respect to the improvement plan and the Confirmatory Action Letter will be conducted as shown. The inspection plan is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last 6 months of the inspection plan are tentative and may be revised at the end-of-cycle review meeting.

In accordance with 10 CFR 2.790 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 the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Kriss Kennedy at 817-860-8144 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

*/RA/*

Thomas P. Gwynn  
Acting Regional Administrator

Docket: 50-298  
License: DPR-46

Enclosure:  
Cooper Nuclear Station Inspection/Activity Plan

cc:

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**Cooper**  
**Inspection / Activity Plan**  
**08/01/2003 - 09/30/2004**

| Unit<br>Number | Inspection Activity                                     | Title  | No. of Staff<br>on Site | Planned Dates |            | Inspection<br>Type   |
|----------------|---|--|-------------------------|---------------|------------|----------------------|
|                |   |  |                         | Start         | End        |                      |
|                | <b>PSBS1-GP - SECURITY INSPECTION PROGRAM</b>           |  | <b>2</b>                |               |            |                      |
| 1              | IP 7113002  | Access Control (Search of Personnel, Packages, and Vehicles: Identification and Authorizat |                         | 08/11/2003    | 08/13/2003 | Baseline Inspections |
| 1              | IP 7113003  | Response to Contingency Events (Protective Strategy and Implementation of Protective Str   |                         | 08/11/2003    | 08/13/2003 | Baseline Inspections |
| 1              | IP 71151  | Performance Indicator Verification   |                         | 08/11/2003    | 08/13/2003 | Baseline Inspections |
|                | <b>CNS CAL - CAL QUARTERLY INSPECTION</b>               |  | <b>3</b>                |               |            |                      |
| 1              | IP 71152  | Identification and Resolution of Problems  |                         | 09/01/2003    | 11/15/2003 | Other Routine        |
|                | <b>OB-PIR - CNS PIR INSPECTION</b>                      |  | <b>6</b>                |               |            |                      |
| 1              | IP 71152B   | Identification and Resolution of Problems  |                         | 09/15/2003    | 09/26/2003 | Baseline Inspections |
|                | <b>OB-RQ - REQUALIFICATION INSPECTION</b>               |  | <b>2</b>                |               |            |                      |
| 1              | IP 7111111B   | Licensed Operator Requalification  |                         | 11/17/2003    | 11/21/2003 | Baseline Inspections |
|                | <b>CNS CAL - CAL QUARTERLY INSPECTION</b>               |  | <b>4</b>                |               |            |                      |
| 1              | IP 71152  | Identification and Resolution of Problems  |                         | 12/08/2003    | 12/12/2003 | Other Routine        |
|                | <b>CNS CAL - CAL QUARTERLY INSPECTION</b>               |  | <b>4</b>                |               |            |                      |
| 1              | IP 71152  | Identification and Resolution of Problems  |                         | 02/23/2004    | 02/27/2004 | Other Routine        |
|                | <b>EMB - MAINTENANCE EFFECTIVENESS</b>                  |  | <b>1</b>                |               |            |                      |
| 1              | IP 7111112B   | Maintenance Effectiveness  |                         | 03/15/2004    | 03/19/2004 | Baseline Inspections |
|                | <b>EMB - TRIENNIAL FIRE PROTECTION</b>                  |  | <b>3</b>                |               |            |                      |
| 1              | IP 7111105T   | Fire Protection  |                         | 04/05/2004    | 04/09/2004 | Baseline Inspections |
| 1              | IP 7111105T   | Fire Protection  |                         | 04/19/2004    | 04/23/2004 | Baseline Inspections |
|                | <b>EMB - PERM. PLANT MODIFICATIONS</b>                  |  | <b>2</b>                |               |            |                      |
| 1              | IP 7111117B   | Permanent Plant Modifications  |                         | 04/05/2004    | 04/09/2004 | Baseline Inspections |
|                | <b>CNS CAL - CAL QUARTERLY INSPECTION</b>               |  | <b>4</b>                |               |            |                      |
| 1              | IP 71152  | Identification and Resolution of Problems  |                         | 04/19/2004    | 04/24/2004 | Other Routine        |
|                | <b>2004041 - HX &amp; HEAT SINK PERFORMANCE TESTING</b> |  | <b>1</b>                |               |            |                      |
| 1              | IP 7111107B   | Heat Sink Performance  |                         | 09/13/2004    | 09/17/2004 | Baseline Inspections |
|                | <b>ALARA1 - ALARA PLANNING AND CONTROLS</b>             |  | <b>1</b>                |               |            |                      |
| 1              | IP 7112102  | ALARA Planning and Controls  |                         | 09/13/2004    | 09/17/2004 | Baseline Inspections |
|                | <b>PSB-EP2 - EP EXERCISE</b>                            |  | <b>3</b>                |               |            |                      |
| 1              | IP 7111401  | Exercise Evaluation  |                         | 09/20/2004    | 09/24/2004 | Baseline Inspections |
| 1              | IP 7111404  | Emergency Action Level and Emergency Plan Changes  |                         | 09/20/2004    | 09/24/2004 | Baseline Inspections |
| 1              | IP 71151  | Performance Indicator Verification   |                         | 09/20/2004    | 09/24/2004 | Baseline Inspections |

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