



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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March 4, 2009

Stewart B. Minahan, Vice  
President-Nuclear and CNO  
Nebraska Public Power District  
72676 648A Avenue  
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SUBJECT: ANNUAL ASSESSMENT LETTER - COOPER NUCLEAR STATION  
(NRC INSPECTION REPORT 05000298/2009001)

Dear Mr. Minahan:

On February 12, 2009, the NRC staff completed its performance review of Cooper Nuclear Station. Our technical staff reviewed performance indicators for the most recent quarter and inspection results for the period from January 1 through December 31, 2008. 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 security information. A separate letter designated and marked as "Official Use Only - Security-Related Information" will include the security cornerstone review and resultant inspection plan.

Overall, Cooper Nuclear Station operated in a manner that preserved public health and safety and fully met all cornerstone objectives with moderate degradation in safety performance. Plant performance for the most recent quarter was within the Degraded Cornerstone column of the NRC's Action Matrix based on two White findings in the mitigating systems cornerstone and all performance indicators indicating performance at a level requiring no additional NRC oversight (Green). The first White finding was identified on March 18, 2008, and involved procedures used by operators to bring the plant to a safe shutdown condition in the event of certain postulated fire scenarios. The procedures could not be performed as written. The second White finding involved inadequate work instructions for maintenance activities that resulted in the failure of the Division 2 emergency diesel generator on January 15, 2008, from a loose electrical connection. In addition, a third White finding was still in effect during the first quarter of 2008 involving the failure to promptly identify and correct a significant condition adverse to quality that resulted in the reduced reliability of Emergency Diesel Generator 2. Due to these findings, the NRC staff determined that since the first quarter of 2008, the mitigating systems cornerstone was degraded.

Consistent with the guidance in Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," the NRC conducted a supplemental inspection using Inspection Procedure 95002, "Inspection for One Degraded Cornerstone or any Three White Inputs in a Strategic Performance Area," in December 2008. This inspection procedure is conducted to provide assurance that the root and contributing causes for the individual and collective risk significant performance issues are understood, to independently assess the extent of condition and extent of cause of the performance issues, to provide assurance that the corrective actions are sufficient to prevent recurrence, and to independently determine if safety culture

components caused or significantly contributed to the individual and collective risk significant performance issues. The supplemental inspection was completed on December 12, 2008, and determined that you performed a comprehensive and thorough evaluation in which specific problems were identified, an adequate root cause evaluation was performed and corrective actions taken or planned to prevent recurrence. Based on the results of the supplemental inspection, the White findings were removed from the Action Matrix at the end of the fourth quarter of 2008.

The staff identified that there were more than three green or safety significant inspection findings for the current 12-month assessment period with documented cross-cutting aspects in the area of human performance, and there is a cross-cutting theme in the aspect of human error prevention techniques (H.4.a) associated with these findings. In evaluating the scope of efforts and progress in addressing the cross-cutting theme, the staff determined that you appropriately recognized the theme and developed corrective actions to address it. Because a reasonable duration of time has not passed for the staff to determine the effectiveness of your corrective actions, we have determined that a substantive cross-cutting issue does not exist at this time. We will continue to closely monitor the progress of your corrective actions through the baseline inspection program over the next assessment period.

The enclosed inspection plan details the inspections, less those related to security, scheduled through June 30, 2010. 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 nine months of the inspection plan are tentative and may be revised at the mid cycle 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 the inspection plan, we will contact you to discuss the change as soon as possible. Please contact Geoffrey Miller, Chief, Division of Reactor Projects, at (817) 860-8144 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

**/RA/**

Elmo E. Collins  
Regional Administrator

Docket: 50-298  
License: DPR-46

Enclosure:  
Cooper Nuclear Station Inspection/Activity Plan

cc w/enclosure:

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File located: R:\\_REACTORS\EOC and Midcycle\EOC Assessment Letters\2008-dated 3-4-09.Cooper.doc

SUNSI Rev Compl.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ADAMS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reviewer Initials	WCW
Publicly Avail	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Sensitive	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sens. Type Initials	WCW

RIV/SPE/DRP/C	SRI:CNS	C:DRP/C	D:DRS	D:DRP	D:DRP
WCWalker	NHTaylor	GBMiller	RJCaniano	DDChamberlain	EECollins
<b>/RA/</b>	<b>/RA/</b>	<b>/RA/</b>	<b>/RA/</b>	<b>/RA/</b>	<b>/RA/</b>
2/19/2009	2/20/2009	2/20/2009	2/23/2009	2/23/2009	3/4/2009

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**Cooper**  
**Inspection / Activity Plan**  
**03/01/2009 - 06/30/2010**

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			<b>PSB2-52B - BIENNIAL PI&amp;R INSPECTION</b>		<b>5</b>
1	03/23/2009	03/27/2009	IP 71152B	Identification and Resolution of Problems	
1	04/06/2009	04/10/2009	IP 71152B	Identification and Resolution of Problems	
			<b>RP-ORS3 - OCCUPATIONAL RADIATION SAFETY - ALARA</b>		<b>1</b>
1	04/13/2009	04/17/2009	IP 7112101	Access Control to Radiologically Significant Areas	
1	04/13/2009	04/17/2009	IP 7112102	ALARA Planning and Controls	
1	04/13/2009	04/17/2009	IP 71151	Performance Indicator Verification	
			<b>RPTEAM - RADIATION SAFETY TEAM INSPECTION</b>		<b>4</b>
1	05/11/2009	05/15/2009	IP 2515/173	Review of the Implementation of the Industry Ground Water Protection Voluntary Initiative	
1	05/11/2009	05/15/2009	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment	
1	05/11/2009	05/15/2009	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems	
1	05/11/2009	05/15/2009	IP 7112202	Radioactive Material Processing and Transportation	
1	05/11/2009	05/15/2009	IP 7112203	Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control Program	
			<b>EB1-17 - 10CFR50.59 AND PLANT MODIFICATION INSPEC</b>		<b>3</b>
1	06/01/2009	06/12/2009	IP 7111117B	Evaluations of Changes, Tests, or Experiments & Permanent Plant Modifications	
			<b>EP1 - BIENNIAL EP PROGRAM INSPECTION</b>		<b>1</b>
1	07/06/2009	07/10/2009	IP 7111402	Alert and Notification System Testing	
1	07/06/2009	07/10/2009	IP 7111403	Emergency Response Organization Augmentation Testing	
1	07/06/2009	07/10/2009	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	07/06/2009	07/10/2009	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
1	07/06/2009	07/10/2009	IP 71151	Performance Indicator Verification	
			<b>EB2-LRI - LICENSE RENEWAL INSPECTION</b>		<b>5</b>
1	07/27/2009	07/31/2009	IP 71002	License Renewal Inspection	
1	08/10/2009	08/14/2009	IP 71002	License Renewal Inspection	
			<b>EXAM - INITIAL EXAM</b>		<b>6</b>
1	08/31/2009	09/04/2009	X02409	INITIAL EXAM-CNS (9/2009)	
1	09/21/2009	09/25/2009	X02409	INITIAL EXAM-CNS (9/2009)	
			<b>EB1-08 - INSERVICE INSPECTION</b>		<b>2</b>
1	10/05/2009	11/02/2009	IP 7111108G	Inservice Inspection Activities - BWR	
			<b>RP-ORS5 - OCCUPATIONAL RADIATION SAFETY - ALARA</b>		<b>1</b>
1	10/26/2009	10/30/2009	IP 7112101	Access Control to Radiologically Significant Areas	
1	10/26/2009	10/30/2009	IP 7112102	ALARA Planning and Controls	
1	10/26/2009	10/30/2009	IP 71151	Performance Indicator Verification	
			<b>EB2-07T - TRIENNIAL HEAT SINK INSPECTION</b>		<b>2</b>
1	12/07/2009	12/11/2009	IP 7111107T	Heat Sink Performance	

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