



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

DEC 27 1999

J. H. Swailes, Vice President of  
Nuclear Energy  
Nebraska Public Power District  
P.O. Box 98  
Brownville, Nebraska 68321

SUBJECT: INSPECTION PLAN - COOPER NUCLEAR STATION

Dear Mr. Swailes:

On December 7, 1999, the NRC staff reviewed the performance of Cooper Nuclear Station as reflected in the performance indicators and inspection results in order to integrate performance information and to plan for inspection activities at your facility from December 1, 1999, through July 31, 2000. The purpose of this letter is to inform you of 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 which may conflict with your plant activities.

We have not identified any areas in which you crossed a performance threshold. Therefore, we plan to conduct only baseline inspections at your facility over the next 8 months.

This letter advises you of our planned inspection effort resulting from the Cooper midcycle review. Enclosure 1 details the scheduled inspections that will occur from December 1, 1999, through July 31, 2000. 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 last 4 months of the inspection plan are tentative and will 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 placed in the NRC Public Document Room (PDR).

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 me at 817/860-8185 with any questions you may have regarding this letter or the inspection plan.

Sincerely,



Charles S. Marschall, Chief  
Project Branch C  
Division of Reactor Projects

Docket No.: 50-298  
License No.: DPR-46

Enclosures:

1. Cooper Nuclear Station Inspection/Activity Plan
2. Plant Issues Matrix

cc w/enclosures:

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E-Mail all documents to Jim Isom for Pilot Plant Program (JAI)

E-Mail all documents to Sampath Malur for Pilot Plant Program (SKM)

E-Mail notification of issuance of all documents to Nancy Holbrook (NBH).

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator

DRP Director

DRS Director

Branch Chief (DRP/C)

Branch Chief (DRP/TSS)

Project Engineer (DRP/C)

Chief, NRR/DIPM/IIPB

Resident Inspector

RIV File

RITS Coordinator

DOCUMENT NAME: R:\PILOT INSPECTION PROGRAM\INSPECTION PLANS\CNS MIDCYCLE INSP PLAN LETTER

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RIV:C:DRP/C		RSLO		PAO				
CSMarschall;df <i>SM</i>		CAHackney <i>SM</i>		BHenderson <i>SM</i>	<i>not available</i>			
12/13/99		12/17/99 <i>(SM)</i>		12/17/99				

OFFICIAL RECORD COPY

**COOPER STATION**  
**Inspection / Activity Plan**  
**12/01/1999 - 07/31/2000**

Units	Inspection Activity	Title	No. of Staff on Site	No. assigned to Procedure	Planned Dates Start	Planned Dates End	Inspection Type
	<b>RPC-F02</b>	<b>- ENGINEERING SELF ASSESSMENT</b>	<b>2</b>				
1	IP 37551	Onsite Engineering		2	01/24/2000	01/28/2000	Regional Initiative
	<b>RPC-R01</b>	<b>- RESIDENT INSPECTOR-WORK CONTROL-OUTAGE</b>	<b>2</b>				
1	IP 71111.13	Maintenance Work Prioritization and Control (I,M,B)		2	02/13/2000	03/25/2000	Other Routine
	<b>RPC-R02</b>	<b>- HEAT SINK-RESIDENT</b>	<b>2</b>				
1	IP 71111.07	Heat Sink Performance (I,M)		2	02/13/2000	03/25/2000	Other Routine
	<b>RPC-R03</b>	<b>- PERMANENT PLANT MODIFICATIONS-RESIDENT</b>	<b>2</b>				
1	IP 71111.17	Permanent Plant Modifications (M,B)		2	02/13/2000	03/25/2000	Other Routine
	<b>RPC-R04</b>	<b>- REFUELLING AND OUTAGE-RESIDENT</b>	<b>2</b>				
1	IP 71111.20	Refueling and Outage Activities (I,M,B)		2	02/13/2000	03/25/2000	Other Routine
	<b>PSB-01</b>	<b>- ALARA PLANNING &amp; CONTROLS</b>	<b>1</b>				
1	IP 71121.02	ALARA Planning and Controls		1	03/06/2000	03/10/2000	Other Routine
	<b>PSB-03</b>	<b>- ACCESS CONTROL TO RAD SIG AREAS &amp; PIV</b>	<b>2</b>				
1	IP 71121.01	Access Control to Radiologically Significant Areas		1	03/20/2000	03/24/2000	Other Routine
1	IP 71151	Performance Indicator Verification		0	03/20/2000	03/24/2000	Other Routine
	<b>PSB-02</b>	<b>- ALARA PLANNING &amp; CONTROLS</b>	<b>1</b>				
1	IP 71121.02	ALARA Planning and Controls		1	04/17/2000	04/21/2000	Other Routine
	<b>PSB-04</b>	<b>- RESPONSE TO CONT EVENTS &amp; PIV</b>	<b>2</b>				
1	IP 71130.03	Response to Contingency Events		2	05/01/2000	05/05/2000	Other Routine
1	IP 71151	Performance Indicator Verification		2	05/01/2000	05/05/2000	Other Routine
	<b>EMB</b>	<b>- 50.59</b>	<b>1</b>				
1	IP 71111.02	Changes to License Conditions and Safety Analysis Report (M,B)		1	05/22/2000	05/26/2000	Other Routine
	<b>EMB01A</b>	<b>- FIRE PROTECTION OPEN ITEM CLOSURE</b>	<b>1</b>				
1	IP 92904	Followup - Plant Support		1	05/22/2000	05/26/2000	Regional Initiative
	<b>OB-RQ</b>	<b>- REQUAL INSP</b>	<b>4</b>				
1	IP 71111.11	Licensed Operator Requalification (M,B)		2	06/19/2000	06/24/2000	Other Routine
	<b>PSB-05</b>	<b>- RAD MONITORING INSTRUMENTATION</b>	<b>1</b>				
1	IP 71121.03	Radiation Monitoring Instrumentation		1	06/19/2000	06/23/2000	Other Routine
	<b>EMB</b>	<b>- PERM PLANT MODS</b>	<b>2</b>				
1	IP 71111.17	Permanent Plant Modifications (M,B)		2	07/17/2000	07/21/2000	Other Routine

## United States Nuclear Regulatory Commission Revised Oversight Process PLANT ISSUE MATRIX

By Cornerstone

Region 4  
 COOPER STATION

Date	Source	ID	Type	Cornerstone	Significance Determination	Item Title Item Description/Significance
10/29/1999	1999011-01	NRC	URI	Mitigating Systems		<p><b>EVALUATION OF EFFECTS ON MOTOR-OPERATED VALVES SUBJECT TO HIGH ENERGY LINE BREAKS</b></p> <p>A leak from the reactor equipment cooling system was found to be the result of leaking tubes in a room cooler in the northeast quadrant of the secondary containment building. This was considered to be potentially significant because the reactor equipment cooling system is required to be capable of providing cooling for 30 days without makeup water. This issue was considered GREEN in the significance determination process since it did not represent an actual loss of safety function of a system, of a single train for more than the technical specification allowable outage time, or of a single train of non-technical specification equipment designated as risk-significant under 10 CFR 50.65 for more than 24 hours.</p>
<p><b>Dockets Discussed:</b> 05000298 COOPER</p>						
09/10/1999	1999003-01	NRC	NCV	Mitigating Systems	Green	<p><b>UNTIMELY CORRECTIVE ACTIONS FOR THE RHR SYSTEM</b></p> <p>Green: In using the cornerstone significance determination process, this issue was determined to have very low risk significance because the system remained operable, although degraded. The residual heat removal heat exchanger operator workaround conditions involving the operation of the heat exchanger outlet valves (including the service water side) had existed for several years. Long-term corrective actions to restore the system's ability to maintain temperature control during shutdown cooling mode of operation, according to the system's original design, had not been developed and implemented. Failure to establish prompt corrective actions for conditions adverse to quality was a violation of 10 CFR Part 50, Appendix B, Criterion XVI. This violation is being treated as a noncited violation (50-298/9903-01), consistent with the Interim Enforcement Policy for pilot plants (Section 1RO7).</p>
<p><b>Dockets Discussed:</b> 05000298 COOPER</p>						
10/09/1999	1999013-01	NRC	NCV	Barrier Integrity	Green	<p><b>Failure to use a gauge that provided adequate repeatability for low pressure testing of the primary contain</b></p> <p>Green. 10 CFR Part 50, Appendix B, Criteria XI, requires that licensees have available and use adequate test instrumentation. The failure to use a gauge that provided adequate repeatability for low pressure testing of the primary containment drywell airlock is a violation. We are treating this violation as noncited, consistent with the Interim Enforcement Policy for pilot plants. The licensee placed this issue in the corrective action program as Problem Identification Report 4-04709.</p> <p>Since the subsequent airlock leak test at accident pressure proved that the airlock continuously met the Technical Specification 3.6.1.2 requirements for operability, the inspectors concluded that this problem had minimal risk significance.</p>
<p><b>Dockets Discussed:</b> 05000298 COOPER</p>						
09/10/1999	1999003-02	NRC	NCV	Occupational Radiation Safety	Green	<p><b>FAILURE TO PERFORM RADIOLOGICAL SURVEY</b></p> <p>Green: In using the cornerstone significance determination process, this issue was determined to have very low risk significance because there was no unintended exposure or substantial potential for one and the ability to assess dose was not compromised. During withdrawal of the transverse incore probe from the reactor core, radiation levels exceeded the 5000 millirems per hour limit of the survey meter in use. As a result, on May 24, 1997, the extent of the radiation levels was unknown. The failure to perform an adequate radiological survey was a violation of 10 CFR Part 20, Section 1501. This violation is being treated as a noncited violation (50-298/9903-02), consistent the Interim Enforcement Policy for pilot plants (Section 2OS4).</p>
<p><b>Dockets Discussed:</b> 05000298 COOPER</p>						

## United States Nuclear Regulatory Commission Revised Oversight Process PLANT ISSUE MATRIX

By Cornerstone

Region 4  
 COOPER STATION

Date	Source	ID	Type	Cornerstone	Significance Determination	Item Title Item Description/Significance
07/17/1999	1999006	Licensee	FIN	Occupational Radiation Safety	Green	<p><b>INSPECTORS REVIEWED THE LICENSEE'S ACTIONS FOLLOWING A JUNE 4, 1999, SPILL OF FLOW-LEVI</b></p> <p>Green. On June 4, 1999, approximately 5,000 gallons of water with 3 to 4 cubic feet of condensate demineralizer resin spilled onto the radioactive waste building basement floor. The inspectors determined that no significant radiation exposure nor potential overexposure had occurred. The inspectors determined that, because no significant radiation exposure nor potential overexposure had occurred, the spill remained within the licensee's response band (green). Operators documented the event in Problem Identification Report 4-02417 (Section 4OA3).</p>
<p><b>Dockets Discussed:</b> 05000298 COOPER</p>						
08/26/1999	1999009-01	NRC	NCV	Public Radiation Safety	Green	<p><b>FAILURE TO CARRY OUT A COMPREHENSIVE SYSTEM OF PLANNED AND PERIODIC AUDITS OF</b> 10</p> <p>The inspector identified a violation for failure to carry out a comprehensive system of planned and periodic audits of the radioactive material packaging and transportation programs in accordance with 10 CFR 71.137. The failure to review all aspects of the radioactive material processing and shipping program could cause programmatic problems to be missed which could ultimately result in unnecessary exposure to radiation workers and members of the public. This violation is being treated as a noncited violation (NCV), consistent with Appendix F of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as Problem Identification Report (Serial Number) 4-03782 (Section 4OA1).</p>
<p><b>Dockets Discussed:</b> 05000298 COOPER</p>						
09/10/1999	1999003	NRC	FIN	Miscellaneous	N/A	<p><b>CORRECTIVE ACTION PROGRAM ADEQUATE</b></p> <p>PIM,NRC,FIN,OTHER,No Color ,9/10/99,,71152            Corrective action program adequate            The corrective action program was generally implemented adequately across all cornerstones, with very low risk significance examples of untimely corrective actions. The licensee's self-assessments were appropriately focused on substantive performance improvement areas. Licensee management identified improving ownership, accountability, and support as a site-wide improvement area and was developing improvement plans at the end of the inspection.</p>
<p><b>Dockets Discussed:</b> 05000298 COOPER</p>						
07/17/1999	1999006-01	NRC	URI	Miscellaneous	N/A	<p><b>INSPECTORS FOUND THAT THE LICENSEE INACCURATELY REPORTED THE NUMBER FOR THE UNPLA</b></p> <p>No color. The inspectors identified three power changes that the licensee should have reported as part of the performance indicator, Unplanned Power Changes per 7,000 Critical Hours, and did not. Following discussions of these events with licensee representatives, the Nuclear Projects Manager initiated Problem Identification Report 4-02841 to address the problem. The inspectors determined that, despite the three additional unplanned power changes, the performance indicator remained green (Section 4OA2).</p>
<p><b>Dockets Discussed:</b> 05000298 COOPER</p>						

# United States Nuclear Regulatory Commission

## Revised Oversight Process PLANT ISSUE MATRIX

By Cornerstone

### Legend

#### Type Codes:

AV	Apparent Violation
FIN	Finding
NCV	NonCited Violation
URI	Unresolved item
VIO	Violation

#### ID Codes:

NRC	NRC
Self	Self-Revealed
Licensee	Licensee

AVs are apparent violations of NRC Requirements that are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action" (Enforcement Policy), NUREG-1600. However, the NRC has not reached its final enforcement decision on the issues identified by the AVs and the PIM entries may be modified when the final decisions are made.

URIs are unresolved items about which more information is required to determine whether the issue in question is an acceptable item, a deviation, a nonconformance, or a violation. A URI may also be a potential violation that is not likely to be considered for escalated enforcement action. However, the NRC has not reached its final conclusions on the issues, and the PIM entries may be modified when the final conclusions are made.



E-Mail all documents to Jim Isom for Pilot Plant Program (JAI)

E-Mail all documents to Sampath Malur for Pilot Plant Program (SKM)

E-Mail notification of issuance of all documents to Nancy Holbrook (NBH).

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