



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

December 7, 1999

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

**SUBJECT: PUBLIC MEETING FOR THE DISCUSSION OF LICENSEE PERCEPTIONS
AND LESSONS LEARNED FROM THE PILOT INSPECTION PROGRAM**

Dear Mr. Swailes:

This refers to the public meeting conducted in the Fort Calhoun Station Auditorium on December 1, 1999, between your staff, representatives from Fort Calhoun Station and the NRC. This meeting was held at the NRC's request to discuss your perceptions and the lessons learned from the pilot inspection program at the Cooper Nuclear and Fort Calhoun Stations. The discussion focused on inspection related activities conducted during the first six months of the revised reactor oversight pilot program that began on May 30, 1999, and was completed on November 27, 1999.

A list of attendees and a copy of presentation slides are enclosed.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

/s/

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

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

Enclosures:

1. Attendance List
2. Licensee Presentation

Nebraska Public Power District

-2-

cc w/enclosures:

G. R. Horn, Senior Vice President
of Energy Supply
Nebraska Public Power District
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Columbus, Nebraska 68601

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Nebraska Public Power District
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Nebraska Public Power District
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Manager - Nuclear
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Lincoln Electric System
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Nebraska Department of Environmental
Quality
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Lincoln, Nebraska 68509-8922

Chairman
Nemaha County Board of Commissioners
Nemaha County Courthouse
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Auburn, Nebraska 68305

Cheryl K. Rogers, Program Manager
Nebraska Health and Human Services System
Division of Public Health Assurance
Consumer Services Section
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Lincoln, Nebraska 68509-5007

Ronald A. Kucera, Director
of Intergovernmental Cooperation
Department of Natural Resources
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Jefferson City, Missouri 65102

Jerry Uhlmann, Director
State Emergency Management Agency
P.O. Box 116
Jefferson City, Missouri 65101

Vick L. Cooper, Chief
Radiation Control Program, RCP
Kansas Department of Health
and Environment
Bureau of Air and Radiation
Forbes Field Building 283
Topeka, Kansas 66620

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

bcc to DCD (IE45)

bcc distrib. by RIV:

Regional Administrator

DRP Director

DRS Director

Branch Chief (DRP/C)

Branch Chief (DRP/TSS)

Project Engineer (DRP/C)

Resident Inspector

RIV File

RITS Coordinator

DOCUMENT NAME: R:_CNS\CN12-1MS-DRP.wpd

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| RIV:PE:DRP/C | | C:DRP/C | | | | | | | |
| JPRodriguez;df | JK | CSMarschal | SM | | | | | | |
| 12/0/99 | | 12/7/99 | | | | | | | |

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DEC -7 1999

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

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| RIV:PE:DRP/C | C:DRP/C | | | | | | | |
| JPRodriguez;df <i>JK</i> | CSMarschall <i>CM</i> | | | | | | | |
| 12/6/99 | 12/7/99 | | | | | | | |

OFFICIAL RECORD COPY

1/27/00

THE BCC DISTRIBUTION OF THE FORT CALHOUN/COOPER DECEMBER 1 MEETING SUMMARY WAS NOT MADE. THE SIGNED LETTER AND LICENSEE PRESENTATION WERE MAILED OUT TO THE CC LIST.

WE REQUESTED AND RECEIVED A COPY OF THE PRESENTATION FROM THE LICENSEE. THE BCC DISTRIBUTION IS ATTACHED.

**OMAHA PUBLIC POWER DISTRICT
FORT CALHOUN STATION
&
NEBRASKA PUBLIC POWER DISTRICT
COOPER NUCLEAR STATION
MEETING ATTENDANCE LIST**

| SUBJECT - NRC PUBLIC MEETING (REVISED REACTOR OVERSIGHT) | | |
|--|---------------------------------|------------------------|
| Date: 12/01/99 | | |
| Name (Please Print) | Title/ Organization | Telephone Extension |
| DAVID ALFORD | LIC. ENGINEER / WCNOE | 216-264-8871 x 4548 |
| Don Garlog | KDEM | 785-279-1402 |
| Phil BARRINGER | KDHE | 785-296-6392 |
| JOE EDOM | NPPD / OPERATIONS | 402-825-2157 |
| Gary Cavanaugh | OPPD | 402-533-6912 |
| Joseph M. Solymosy | OPPD - FCS Mgr | 402-533-6625 |
| John H MacKinnon | OPPD - SARC Chair | 440 639 2311 |
| Amy L. GUETS | OPPD - Quality | 402-533-7269 |
| Geoff Cooks | Supervisor, NRC/SARC | (949) 368-7571 |
| Jim Sloan | SPT - San Onofre | (949) 492-2641 |
| Roger D. Walker | Regulatory Affairs Manager, TXU | 254-897-5277 |
| Jeff Spilker | OPPD | 402-533-6663 |
| Richard Jaworski | OPPD | 402-533-6083 |
| Wayne Ferdy | Legal, Inc. | 402-533-5360 |
| Jim Long | NPPD/CNS | 402-825-5820 |
| Alan Madison | NRC | (301) 415-1490 |
| WAYNE C WALKER | US NRC - RIV | 452-426-9611 |
| JOE LAUX | AMERENUE - CALLAWAY QA | 573-676-8659 |
| MARU A TESAR | OPPD | 402 533-7250 |
| Gary Williams | OPPD | 402-636-2747 |
| JIM SUMNER | NPP | 402 825 5669 |
| J.R. ROBINSON | NPPD | 402 825 5847 |
| RD STODDARD | LES | 402 475-3888 F |
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| Ralph Phelps | OPPD | 402 533 7210 |

ENCLOSURE 2

**Region IV Licensee
Perceptions and
Lessons Learned from
RROP Pilot Program**

**December 1, 1999
Fort Calhoun Station**

**Pilot Plant Participants -
Fort Calhoun Station & Cooper Nuclear Station**

Opening Remarks

- **Welcome (Mr. Gary Gates, Vice President, Fort Calhoun Station)**
- **Agenda Review (Mr. Paul Caudill, Senior Manager of Technical Services, Cooper Nuclear Station)**

Agenda

- Introduction (Mr. Gary Gates/FCS and Mr. Paul Caudill/CNS)
- PI's (Mr. Jim Long/ CNS)
- Inspections (Mr. Mark Frans/ FCS)
- SDP (Mr. Joe Edom/CNS)

Agenda

- NRC Assessment of Findings and Enforcement (Dr. R. L. Jaworski/FCS)
- Industry Implementation Issues (Mr. Jim Chase/FCS)
- Closing Comments (Mr. Gary Gates/FCS and Mr. Paul Caudill/CNS)

Performance Indicators

Mr. Jim Long
Nuclear Projects Manager
Cooper Nuclear Station

Dynamic Process

Process Still Evolving:

- Overall Perspective
- Historical Data Submission
- Ongoing Refinements
- Internal Processes

Performance Indicator Reporting

Accuracy Versus Timeliness:

- Definitions & Application Issues
- Reporting Errors
- 14 Day Reporting Requirement

Areas For Continued Dialog

Focus Areas:

- Resolve 50.9 Issue
- Develop Solid Change Process
- Encourage Ongoing Learning
- Integration With Other PI
Systems

Inspections

Mr. Mark Frans
Manager - Nuclear
Licensing
Fort Calhoun Station

Pilot Inspections

- Inspection Process
 - Focus
- Inspection Resources
 - NRC
 - Utility
- Inspection Procedures
 - Adequacy
 - New Requirements

Pilot Inspections

- Inspectors Knowledge
- Inspection Exits
- Inspection Reports

Areas for Continued Dialog

- Security and Fire Protection
- Performance based frequency recommended for mature programs
- Inconsistent application of screening criteria

Significance Determination Process

Mr. Joe Edom

Assistant to the Operations
Manager

Cooper Nuclear Station

Historical Perspective

- SDP Evolved Rapidly
- Review of Rx Safety SDP
- Overall Perception

Cooper and Fort Calhoun Processes

- Developed Internal Processes
- Established Lower Thresholds
- Provided Basis for “Same Language” Conversations
- Shared Internal Process With Industry Groups

Areas for Continued Dialog

- Fire Protection SDP
- Physical Protection SDP
- NRC “Pre-Screening” Process
- Event SDP

Assessment and Enforcement Programs

Dr. R. L. Jaworski
RROP Implementation
Project Manager
Fort Calhoun Station

Assessment Program

- Minimal Assessment Program Experience
- Assessment of FCS WHITE PI on EP-DEP Concluded Appropriately
- Response to Findings Has Been Consistent With the Action Matrix
- No Aggregation of Green Findings is Appropriate

ENFORCEMENT PROCESS

- Neither Plant Has Had Enforcement Experience Dealing With Significant Issues.
- Pilot Program Enforcement Policy Addressed the Key Issues

AREAS FOR CONTINUING DIALOG

- Assessment of Findings of No Color
- Some “End-of Cycle” Assessment Reviews Should Be Completed Before 4/1
- Lack of Industry Experience With the Enforcement Process Must Be Recognized in Subsequent RROP Actions

Industry Implementation Issues

Mr. Jim Chase
Division Manager -
Assessments
Fort Calhoun Station

Culture Change

- Licensees and NRC Embracing Change
 - Additional attention needed
 - Licensees need strong CAP's
 - Licensees need strong self assessment programs
 - Licensees and NRC need to fully understand any finding of color
 - Appears some inspectors still inspecting without a focus on "Risk"
 - Screening process for minor violations and entry into SDP not used consistently

Industry Comments

- PI's
 - Each Licensee needs program for training, gathering, and validation of PI's
 - Scope varies per licensee
 - Continual Changes of PI's
 - Security (not well defined)
 - Containment leakage
 - Emergency AC power (changed 4 times in the past 6 months)

Industry Comments

- Resolution of PI Data Submittal
 - Historical data
 - Erroneous data
- Time Frame for PI Submittal
 - 14 day

Industry Comments

- Inspection Procedures
 - Appear to be risk informed
 - Supplemental procedures
 - Most not exercised
 - Problem identification and resolution inspection
 - Most controversial

Industry Comments

- SDP
 - Use varies across the country
 - Changing as we go foreword
 - Security SDP
 - Licensee's and inspectors need to understand the screening process and the SDP

Bottom line

- New Process Is:
 - Risk informed and objective
 - More responsibility on licensee
- Need to Stay Engaged With Inspectors
- Need to Address Change Management
 - NRC
 - Licensee
- Regulations
 - Remain the same
- Technical Specification
 - Need to comply with

Closing Comments

Mr. Paul Caudill

Senior Manager of
Technical Services

Cooper Nuclear Station

and

Mr. Gary Gates

Vice President

Fort Calhoun Station