



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

December 7, 1999

S. K. Gambhir, Division Manager
Nuclear Operations
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
P.O. Box 399
Hwy. 75 - North of Fort Calhoun
Fort Calhoun, Nebraska 68023-0399

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

Dear Mr. Gambhir:

This refers to the public meeting conducted in the Fort Calhoun Station Auditorium on December 1, 1999, between your staff, representatives from Cooper Nuclear 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.: 50-483
License No.: NPF-30

Enclosures:
1. Attendance List
2. Licensee Presentation

Omaha Public Power District

-2-

cc w/enclosures:

Mark T. Frans, Manager
Nuclear Licensing
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
P.O. Box 399
Hwy. 75 - North of Fort Calhoun
Fort Calhoun, Nebraska 68023-0399

James W. Chase, Division Manager
Nuclear Assessments
Fort Calhoun Station
P.O. Box 399
Fort Calhoun, Nebraska 68023

J. M. Solymossy, Manager - Fort Calhoun Station
Omaha Public Power District
Fort Calhoun Station FC-1-1 Plant
P.O. Box 399
Hwy. 75 - North of Fort Calhoun
Fort Calhoun, Nebraska 68023

Perry D. Robinson, Esq.
Winston & Strawn
1400 L. Street, N.W.
Washington, D.C. 20005-3502

Chairman
Washington County Board of Supervisors
Washington County Courthouse
P.O. Box 466
Blair, Nebraska 68008

Cheryl K. Rogers, Program Manager
Nebraska Health and Human Services System
Division of Public Health Assurance
Consumer Services Section
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509-5007

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)

Project Engineer (DRP/C)

RIV File

RITS Coordinator

Resident Inspector

Branch Chief (DRP/TSS)

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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	316-364-8881 x 4548
Don Garbo	K'DEM	785-279-1402
Phil BARRINGER	K'DHE	785-296-6342
JOE EDOM	NPPD / OPERATIONS	402-825-2557
Gary Cavanaugh	OPPD	402-533-6912
Joseph M. Seligson	OPPD - FCS Mgr	402-533-6626
John W MacKinnon	OPPD - SARE Chair	402-639-2311
Amy L. GURTIS	OPPD - Quality	402-583-7269
Geoff Cooks	Supervisor, NRR/SAR/S	(949) 368-7572
Jim Sloan	SPT - San Onofre	(949) 492-2641
Roger D. Walker	Regulatory Affairs Manager, TXU	254-877-4277
Jeff Spilker	OPPD	402-533-6663
Richard Jaworski	OPPD	402-533-6083
Way Fendley	Judic. Dir.	402-393-5360
Jim Long	NPPD/CNS	402-825-5850
Alan Madison	NRC	(301) 415-1490
WAYNE C WALKER	US NRC - RIV	402-426-9611
JOE LAUX	AMERICAN - CALLAWAY DB	573-676-8659
MARY A TESAR	OPPD	402-533-7250
Gary Williams	OPPD	402-636-2748
Jim SIMPNER	NPPD	402-825-5869
J. R. ROBINSON	NPPD	402-825-5847
RD STADZARD	LES	402-478-7868
Jim Vandergilt	Energy	501-858-4601
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