



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

February 13, 2012

Mr. Brian J. O'Grady  
Vice President-Nuclear and CNO  
Nebraska Public Power District  
72676 648A Avenue  
Brownville, NE 68321

SUBJECT: COOPER NUCLEAR STATION - REQUEST FOR ADDITIONAL INFORMATION  
RE: REQUEST FOR RELIEF FOR THE FOURTH 10-YEAR PUMP AND VALVE  
INSERVICE TESTING PROGRAM (TAC NO. ME7021)

Dear Mr. O'Grady:

By letter dated August 24, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11242A129), Nebraska Public Power District (NPPD, the licensee) submitted requests for relief (RV-07, Revision 0, and RV-01, Revision 1) from certain inservice testing (IST) American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Code) requirements for Cooper Nuclear Station pursuant to Section 50.55a of Title 10 of the *Code of Federal Regulations*. These requests are applicable to the fourth 10-year IST interval, which began March 1, 2006, and request relief from certain IST Code requirements regarding the required 2-year test interval for pressure isolation valve leakage rate testing and the frequency for disassembly and examination of the affected components.

The U.S. Nuclear Regulatory Commission staff has reviewed your submittal and determined that additional information is needed for the staff to complete its evaluation. The RAI was transmitted via e-mail to Mr. Edward McCutchen of your staff on January 13, 2012. Mr. McCutchen indicated via telephone on January 26, 2011, that the response would be provided within 30 days of receipt of this letter.

B. O'Grady

- 2 -

If you have any questions, please contact me at 301-415-1377 or via e-mail at [Lynnea.wilkins@nrc.gov](mailto:Lynnea.wilkins@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Lynnea Wilkins', with a stylized flourish at the end.

Lynnea E. Wilkins, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

By letter dated August 24, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11242A129), Nebraska Public Power District (NPPD, the licensee) submitted requests for relief (RV-07, Revision 0, and RV-01, Revision 1) from certain inservice testing (IST) requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Code), for Cooper Nuclear Station (CNS), pursuant to Section 50.55a of Title 10 of the *Code of Federal Regulations*. These requests are applicable to the fourth 10-year IST interval, which began March 1, 2006, and request relief from certain IST Code requirements regarding the required 2-year test interval for pressure isolation valve leakage rate testing and the frequency for disassembly and examination of the affected components.

The U.S. Nuclear Regulatory Commission staff has reviewed and evaluated the information provided by the licensee and has determined that the following information is needed in order to complete its review.

1. Please describe how NPPD is meeting the requirements of ISTC-3530, "Valve Obturator Movement," ISTC-5151, "Solenoid-Operated Valves (SOVs) – Valve Stroke Testing," ISTC-5152, "SOVs – Stroke Test Acceptance Criteria," and ISTC-5153, "SOVs - Stroke Test Corrective Action," at CNS. Please state if NPPD also needs relief from these requirements based on this request.
2. For this relief request, NPPD requested relief from ISTC-3510, "Exercising Test Frequency." NPPD stated in the August 24, 2011, request that it will exercise each valve to the full closed position on a quarterly basis, which is equivalent to the "nominally every 3 month" requirement of ISTC-3510. Please describe in greater detail the basis for NPPD's request for relief from ISTC-3510 since, it appears that NPPD can meet the requirement.
3. Please provide any additional operational history (maintenance and reliability data) for valves similar to high-pressure coolant injection (HPCI)-SOV-SSV64 and HPCI-SOV-SSV87 at CNS that can demonstrate greater reliability of these valves for time periods longer than the four maintenance cycles stated in this request.
4. Please discuss the consequences of HPCI-SOV-SSV64 and HPCI-SOV-SSV87 failure during normal and emergency operations.
5. The August 24, 2011 submittal provides risk information but does not indicate that this is a risk-informed application consistent with Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and RG 1.175, "An Approach for Plant Specific Risk-

Enclosure

Informed Decision Making Inservice Testing.” The staff does not typically consider risk information that does not address RG 1.174 and RG 1.175. Please confirm that this submittal is not intended to be risk-informed or provide information consistent with RG 1.174, RG 1.175, and RG 1.200, Revision 2, “An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk Informed Activities.”

B. O'Grady

- 2 -

If you have any questions, please contact me at 301-415-1377 or via e-mail at [Lynnea.wilkins@nrc.gov](mailto:Lynnea.wilkins@nrc.gov).

Sincerely,

/RA/

Lynnea E. Wilkins, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-298

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**ADAMS Accession No.: ML120270155**

**\*via memo dated**

OFFICE	NRR/LPL4/PM	NRR/LPL4/LA	NRR/DE/EPTB/BC	NRR/LPL4/BC	NRR/LPL4/PM
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DATE	1/30/12	1/30/12	12/19/11	2/10/12	2/13/12

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