



Nebraska Public Power District

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NLS2012048

June 7, 2012

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: Nebraska Public Power District's 90-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Nuclear Regulatory Commission letter to Nebraska Public Power District, dated March 12, 2012, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident"
 2. Nebraska Public Power District letter to Nuclear Regulatory Commission, dated May 9, 2012, "Nebraska Public Power District's 60-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments" (NLS2012034)

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission issued Reference 1. Enclosure 5 of Reference 1 contains specific requested actions and requested information associated with Recommendation 9.3 for Emergency Preparedness programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also provided requested due dates for written responses.

In accordance with Reference 2 (60-day response), on May 9, 2012, Nebraska Public Power District submitted an alternative course of action for providing the requested information. The alternative course of action included revised information due dates and the basis for those dates. As described in the alternative course of action, Attachment 1 to this letter transmits the responses to the following information requests: Enclosure 5 communications request #2 and staffing requests #3, #4, and #5.

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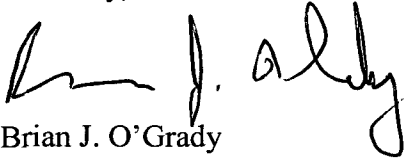
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The new commitments contained in this submittal are summarized in Attachment 2. Should you have any questions concerning the content of this letter, please contact David Van Der Kamp, Licensing Manager, at (402) 825-2904.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 7 2012

Sincerely,

A handwritten signature in black ink, appearing to read "Brian J. O'Grady".

Brian J. O'Grady
Vice President - Nuclear and
Chief Nuclear Officer

/bk

Attachments: 1. Request for Information 90-Day Emergency Preparedness Response
2. List of Regulatory Commitments

cc: Regional Administrator w/attachments
USNRC - Region IV

Director w/attachments
USNRC - Office of Nuclear Reactor Regulation

Cooper Project Manager w/attachments
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/attachments
USNRC - CNS

NPG Distribution w/attachments

CNS Records w/attachments

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Attachment 1

**Request for Information
90-Day Emergency Preparedness Response**

**Request for Information (RFI)
90-Day Emergency Preparedness Response**

Communications:

RFI 2 – Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

Purchase orders have been submitted for two uninterruptible power supplies (UPS) to be used at Cooper Nuclear Station (CNS) to provide backup power upon loss of alternating current power for radio communications systems for onsite response teams and offsite field monitoring teams. The schedule for implementation of the UPS units will be provided with the communications assessment by October 31, 2012, as previously committed to in the 60-day response (Reference 2).

CNS currently deploys handheld radios for use by Security, Operations, and the Emergency Response Organization (ERO) and B.5.b—dedicated radios to be used for communications with onsite response teams or offsite field monitoring teams. The radios can be used in the “Push-to-Talk” mode in the event that the repeaters are damaged or otherwise unavailable. The existing analog radios are being replaced with digital models during the modification for meeting mandated Federal Communications Commission changes in the fourth quarter of 2012. CNS will procure the digital radios in accordance with this modification.

CNS has purchased, received, and deployed 14 battery-operated satellite phones for emergency response personnel onsite and offsite communications. The associated procedure has been revised to describe the locations and use of the satellite phones.

Staffing:

RFI 3 – Identify how the augmented staff would be notified given degraded communications capabilities.

Initial instructions have been communicated to the ERO to respond to their assigned emergency response facilities when made aware of an area-wide loss-of-grid that results in degraded communications capability. These instructions will be proceduralized and included in the ERO annual requalification training program by December 12, 2012.

RFI 4 – Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

There are several roadways into and around CNS. If one path were impassable, detours using other roadways are viable. Major routes are: East-West routes include Highways 2, 136, and 159. North-South routes include Interstate 29, Highways 67 and 75. The station may be accessed via county road from either the North or the South.

Nebraska Public Power District (NPPD) owns and operates various types of watercraft to perform routine activities related to energy generation and delivery. NPPD utilizes an air boat that would be available for personnel transport within approximately five hours, and CNS operates a boat for the purposes of maintaining equipment along the Missouri River.

NPPD is in the process of developing agreements with Nebraska state agencies and a private helicopter service to obtain logistical support for the transport of emergency responders to the site in the event of a large-scale natural disaster that inhibits site access. A contingency requisition, which was developed for the helicopter service in response to Missouri River levels in 2011, will be finalized. The state agreements will address clearing of access roads as conditions warrant. NPPD anticipates that applicable agreements or suitable arrangements with state emergency management and the helicopter service will be established by October 30, 2012.

The following agreements are already in-place for assistance and/or services:

- Nebraska State Patrol
- Nebraska State Emergency Management Agency
- Missouri State Emergency Management Agency
- Nebraska Department of Health and Human Services
- Atchison County Commission
- Nemaha County Sheriff
- Richardson County Sheriff
- Nebraska Game and Parks

- Village of Nemaha Fire Department
- Village of Brownville Fire Department
- City of Auburn Fire Department
- City of Peru Fire Department
- City of Nebraska City Fire Department

In support of these agreements NPPD is evaluating additional potential staging areas to be used by the emergency responders, if they are available, as common locations for transport to the CNS site. This evaluation will be completed by October 30, 2012.

RFI 5 – Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

NPPD is currently assessing initial on-shift ERO staffing at CNS for design-basis event conditions in response to the requirements of changes to 10 CFR Part 50, Appendix E, Section IV (A)(9), by December 24, 2012. Although limited to the time following a design-basis event initiation until the on-shift ERO is augmented, this assessment is expected to provide an initial indication of the adequacy of staffing to respond to beyond design-basis events.

To support extended presence of emergency workers on site, CNS stocks prepared meals, canned food, cots, blankets, and five-gallon bottles of water.

References:

1. Nuclear Regulatory Commission letter to NPPD, dated March 12, 2012, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident"
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Attachment 2

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT / COMMITMENT NO.	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
NPPD will proceduralize instructions for the Emergency Response Organization (ERO) to respond to their assigned emergency response facilities when made aware of an area-wide loss-of-grid that results in degraded communications capability and will include in the ERO annual requalification training program. NLS2012048-01		X	December 12, 2012
NPPD is evaluating additional potential staging areas to be used by the emergency responders, if they are available, as common locations for transport to the CNS site. NLS2012048-02	X		October 30, 2012
NPPD is in the process of developing agreements with Nebraska state agencies and a private helicopter service to obtain logistical support for the transport of emergency responders to the site in the event of a large-scale natural disaster that inhibits site access. A contingency requisition, which was developed for the helicopter service in response to Missouri River levels in 2011, will be finalized. The state agreements will address clearing of access roads as conditions warrant. NPPD anticipates that applicable agreements or suitable arrangements with state emergency management and the helicopter service will be established. NLS2012048-03		X	October 30, 2012