



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

May 6, 2015

Mr. Oscar A. Limpias  
Vice President-Nuclear and CNO  
Nebraska Public Power District  
Cooper Nuclear Station  
72676 648A Avenue  
P.O. Box 98  
Brownville, NE 68321

**SUBJECT: NUCLEAR REGULATORY COMMISSION PLAN FOR THE AUDIT OF  
NEBRASKA PUBLIC POWER DISTRICT'S FLOOD HAZARD REEVALUATION  
REPORT SUBMITTAL RELATING TO THE FUKUSHIMA NEAR-TERM TASK  
FORCE RECOMMENDATION 2.1-FLOODING FOR COOPER NUCLEAR  
STATION (TAC NO. MF4712)**

Dear Mr. Limpias:

This letter documents the U.S Nuclear Regulatory Commission (NRC) staff's plan to perform a regulatory audit of Nebraska Public Power District's (the licensee) Flood Hazard Reevaluation Report (FHRR) submittal related to the Fukushima Near-Term Task Force Recommendation 2.1, Flooding for Cooper Nuclear Station (Cooper). This technical audit will be performed consistent with NRC Office of Nuclear Reactor Regulation, Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML082900195). The audit will be conducted over multiple sessions, as needed, and the NRC staff will develop an audit summary report to document its observations and conclusions within 90 days of the final audit session.

The audit will provide the NRC with a better understanding of the Cooper FHRR which was submitted on February 3, 2015 (ADAMS Accession No. ML15041A523). Specifically, the audit will provide the NRC with a better understanding of the analyses of the flooding hazards presented in the Cooper FHRR. The audit is intended to support completion of the staff's review of the FHRR and the subsequent issuance of a Staff Assessment.

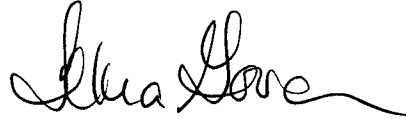
The enclosed audit plan outlines the process that will allow the NRC staff to identify additional information necessary for the staff to complete the FHRR review. The details of this audit have been discussed with Mr. Jim Flaherty of your staff.

O. Limpias

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If you have any questions, please contact me at (301) 415-6197 or by e-mail at Tekia.Govan@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tekia Govan", with a long, sweeping horizontal line extending to the right.

Tekia V. Govan, Project Manager  
Hazards Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosure:  
Audit Plan

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NRC PLAN FOR THE AUDIT OF NEBRASKA PUBLIC POWER DISTRICT'S FLOOD HAZARD  
REEVALUATION REPORT SUBMITTAL RELATING TO THE FUKUSHIMA NEAR-TERM  
TASK FORCE RECOMMENDATION 2.1-FLOODING FOR COOPER NUCLEAR STATION

BACKGROUND AND AUDIT BASIS:

By letter dated March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) "Conditions of license" (hereafter referred to as the "50.54(f) letter"). The request was issued in connection with implementing lessons-learned from the 2011 accident at the Fukushima Dai-ichi nuclear power plant, as documented in The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident. Recommendation 2.1 of that document recommended that the staff issue orders to all licensees to reevaluate seismic and flooding for their sites against current NRC requirements and guidance. Subsequent Staff Requirements Memoranda associated with Commission Papers SECY 11-0124 and SECY-11-0137, instructed the NRC staff to issue requests for information to licensees pursuant to 10 CFR 50.54(f).

By letter dated February 3 , 2015, Nebraska Public Power District (NPPD, the licensee) submitted its Flood Hazard Reevaluation Report (FHRR) for Cooper Nuclear Station (Cooper) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15041A523). The NRC staff has begun its review of the aforementioned submittal and plans to conduct a regulatory audit of NPPD to aid in its review of the licensee's FHRR.

REGULATORY AUDIT SCOPE AND METHODOLOGY:

The areas of focus for the regulatory audit is the information contained in the Cooper FHRR submittal, and all associated and relevant supporting documentation used in the development of the aforementioned document including, but not limited to, methodology, process information, calculations, computer models, etc. The audit will be conducted and completed over several meetings, the dates of which will be determined, as necessary.

Enclosure

**INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT:**

The information required for the audit is the licensee's models and supporting calculations and documentation related to the storm surge and site specific probable maximum precipitation analyses. Other information needs will be discussed as audit meetings are scheduled.

**NRC AUDIT TEAM:**

<b>Title</b>	<b>Team Member</b>	<b>Affiliation</b>
Team Leader, NRR/JLD	Tekia Govan	NRC
Branch Chief, NRO/DSEA	Chris Cook	NRC
Technical Lead	Ken See	NRC
Technical Manager	Laura Quinn-Willingham	NRC
Technical Support	Kevin Stuart	Oak Ridge National Laboratory
Technical Support	Ellen Smith	Oak Ridge National Laboratory
Technical Support	Greg Zimmerman	Oak Ridge National Laboratory
Technical Support	David Watson	Oak Ridge National Laboratory

**LOGISTICS:**

The audit meetings will be coordinated with NPPD staff.

**DELIVERABLES:**

The NRC team will develop an audit summary report to convey the audit results. The report will be placed in ADAMS within 90 days of the completion of the final audit session, and will be publicly available.

The information discussed in the audit may be included, fully or in part, in the development of the NRC technical staff's assessment documenting the staff's FHRR review.

O. Limpias

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If you have any questions, please contact me at (301) 415-6197 or by e-mail at Tekia.Govan@nrc.gov.

Sincerely,

/RA/

Tekia V. Govan, Project Manager  
Hazards Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosure:  
Audit Plan

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**ADAMS Accession No.: ML15125A060**

<b>OFFICE</b>	NRR/JLD/JHMB/PM	NRR/JLD/LA	NRR/JLD/JHMB/BC	NRR/JLD/JHMB/PM
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