



**Nebraska Public Power District**

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NLS2015086

July 13, 2015

U.S. Nuclear Regulatory Commission

Attention: Document Control Desk

Washington, D.C. 20555-0001

**Subject:** Response to Nuclear Regulatory Commission Additional Requests for Additional Information for License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Makeup Water  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Email from Siva Lingam, U.S. Nuclear Regulatory Commission, to Jim Shaw, Nebraska Public Power District, dated June 29, 2015, "Cooper - Additional RAIs Resulting From NPPD RAI Responses for LAR Associated with Deleting Condensate Storage Tank as an Alternate Source of Makeup Water (TAC No. MF4716)"
  2. Letter from Oscar A. Limpias, Nebraska Public Power District, to the U.S. Nuclear Regulatory Commission, dated August 26, 2014, "License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Makeup Water" (ML14246A203)
  3. Letter from Oscar A. Limpias, Nebraska Public Power District, to the U.S. Nuclear Regulatory Commission, dated February 25, 2015, "Response to Nuclear Regulatory Commission Requests for Additional Information for License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Make-Up Water" (ML15062A037)

Dear Sir or Madam:

The purpose of this letter is for the Nebraska Public Power District to respond to the Nuclear Regulatory Commission's Requests for Additional Information (RAI) (Reference 1) related to the Cooper Nuclear Station "License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Makeup Water" (Reference 2) and "Response to Nuclear Regulatory Commission Requests for Additional Information for License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Make-Up Water" (Reference 3).

The response to the specific RAI questions is provided in the attachment to this letter.

This letter does not contain any new regulatory commitments.

**COOPER NUCLEAR STATION**

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[www.nppd.com](http://www.nppd.com)

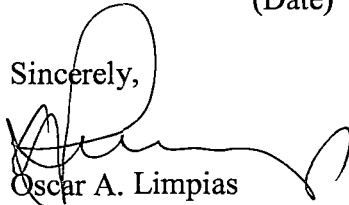
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NPPD

If you have any questions concerning this matter, please contact Jim Shaw, Licensing Manager, at (402) 825-2788.

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

Executed on 7/13/15  
(Date)

Sincerely,



Oscar A. Limpas  
Vice President - Nuclear  
and Chief Nuclear Officer

/jo

Attachment: Response to Nuclear Regulatory Commission Additional Requests for Additional Information for License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Makeup Water

cc: Regional Administrator w/ attachment  
USNRC - Region IV

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

Senior Resident Inspector w/ attachment  
USNRC - CNS

NPG Distribution w/o attachment

CNS Records w/ attachment

**Attachment**

**Response to Nuclear Regulatory Commission Additional Requests for Additional Information for License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Makeup Water**

**Cooper Nuclear Station, Docket No. 50-298, DPR-46**

The Nuclear Regulatory Commission (NRC) additional requests for additional information (RAI) regarding the License Amendment Request (LAR) to delete the Condensate Storage Tank (CST) as an Alternate Source of Makeup water are shown in italics. The Nebraska Public Power District (NPPD) response to the requests is shown in normal font.

RAI-1

*With the removal of option 'b' from TS surveillance requirement 3.5.2.1, what changes will be made to Emergency Operating Procedure 5.8.14, 'Suppression Pool Make Up Systems,' or other procedures?*

NPPD Response

Procedure 5.8.14 provides makeup to the suppression pool from the CST and other sources. Removal of option b from Technical Specifications does not affect providing makeup to the suppression pool using Procedure 5.8.14; therefore Procedure 5.8.14 does not require any changes.

Removal of option b from Technical Specifications will affect two other procedures. Procedure 2.2.9, Core Spray (CS) System, Revision 75, and 2.2.69.1, Residual Heat Removal (RHR) Low Pressure Coolant Injection (LPCI) Mode, Revision 26, were revised to specify that RHR and CS are inoperable when the pump's suction is aligned to CST A.

RAI-2.1

*Identify any operator actions that will be changed, deleted, or added in support of this LAR? If actions will be changed or added, will any of these actions be time critical? If yes, discuss.*

NPPD Response

This LAR removes an option to align RHR and CS suctions to CST A and remain OPERABLE. This option was used infrequently and only while the plant was shutdown. The procedures that contain this guidance are still in place but have been revised to specify that RHR and CS are inoperable when their suctions are aligned to the CST. No time critical operator actions are involved.

RAI-2.2

*Identify any affected procedures by number, title, revision, and a brief summary of the change(s) necessary to support this LAR.*

NPPD Response

Procedure 2.2.9, CS System, Revision 75, and 2.2.69.1, RHR LPCI MODE, Revision 26, were revised to specify that RHR and CS are inoperable when their suctions are aligned to the CST.

RAI-2.3

*Identify any changes to training that are required to support this LAR.*

NPPD Response

As part of the license amendment implementation, the training lesson plans for CS and RHR systems will be revised to remove reference to operability when the system is aligned to take suction from the CST. Also, the lesson plan for Technical Specifications Section 3.5 will be revised to remove the reference to CST water level  $\geq 14$  feet, taking credit for CST suction during Operations with the Potential to Drain the Reactor Vessel, and reference to the CST as a suction path for operability.

RAI-2.4

*Will any changes to the control room displays, controls, alarms, or annunciators, or the Safety Parameter Display System be required to support this LAR?*

NPPD Response

None required. This alignment is not mimicked on any Control Room display, has no controls in the Control Room, is not alarmed in the Control Room, and is not in the Safety Parameter Display System.

RAI-2.5

*Will validation of the feasibility and reliability of new or changed operator actions be performed? If not, why not?*

NPPD Response

No, no operator actions were changed.