



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

March 7, 2016

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: COOPER NUCLEAR STATION - PLAN FOR THE ONSITE AUDIT REGARDING  
IMPLEMENTATION OF MITIGATING STRATEGIES AND RELIABLE SPENT  
FUEL INSTRUMENTATION RELATED TO ORDERS EA-12-049 AND EA-12-  
051 (CAC NOS. MF0971 AND MF0972)

Dear Mr. Limpias:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" and Order EA-12-051, "Issuance of Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation [SFPI]," (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12054A736 and ML12054A679, respectively). The orders require holders of operating reactor licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* Part 50 to submit for review, Overall Integrated Plans (OIPs) including descriptions of how compliance with the requirements of Attachment 2 of each order will be achieved.

By letter dated February 28, 2013 (ADAMS Accession No. ML13070A009), Nebraska Public Power District (NPPD, the licensee) submitted its OIP for Cooper Nuclear Station, (CNS), in response to Order EA-12-049. By letters dated August 27, 2013, February 26, 2014, August 26, 2014, February 23, 2015, August 27, 2015 and February 16, 2016 (ADAMS Accession Nos. ML13247A283, ML14064A201, ML14246A188, ML15062A040, ML15251A239 and ML16054A799, respectively), the licensee submitted its first six, six-month updates to the OIP. By letter dated August 28, 2013 (ADAMS Accession No. ML13234A503), the NRC notified all licensees and construction permit holders that the staff is conducting audits of their responses to Order EA-12-049 in accordance with NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). This audit process led to the issuance of the CNS interim staff evaluation (ISE) (ADAMS Accession No. ML14007A650) and continues with in-office and onsite portions of this audit.

By letter dated February 28, 2013 (ADAMS Accession No. ML13070A007), the licensee submitted its OIP for CNS, in response to Order EA-12-051. By e-mail dated September 12, 2013 (ADAMS Accession No. ML13256A082), the NRC staff sent a request for additional information (RAI) to the licensee. By letters dated October 14, 2013, August 27, 2013, February 26, 2014, August 26, 2014, February 23, 2015, August 27, 2015 and February 16, 2016 (ADAMS Accession Nos. ML13294A027, ML13247A281, ML14064A265, ML14246A204, ML15062A038, ML15253A370 and ML16054A798, respectively), the licensee submitted its RAI

responses and first six, six-month updates to the OIP. The NRC staff's review to date led to the issuance of the CNS ISE and RAI dated December 4, 2013 (ADAMS Accession No. ML13323A105). By letter dated March 26, 2014 (ADAMS Accession No. ML14083A620), the NRC notified all licensees and construction permit holders that the staff is conducting in-office and onsite audits of their responses to Order EA-12-051 in accordance with NRC NRR Office Instruction LIC-111, as discussed above.

The ongoing audit process, to include the in-office and onsite portions, allows the staff to assess whether it has enough information to make a safety evaluation of the Integrated Plans. The audit allows the staff to review open and confirmatory items from the mitigation strategies ISE, RAI responses from the SFPI ISE, the licensee's integrated plans, and other audit questions. Additionally, the staff gains a better understanding of submitted information, identifies additional information necessary for the licensee to supplement its plan, and identifies any staff potential concerns. The audit's onsite portion will occur prior to declarations of compliance for the first unit at each site.

This document outlines the on-site audit process that occurs after ISE issuance as licensees provide new or updated information via periodic updates, update audit information on e-portals, provide preliminary Overall Program Documents/Final Integrated Plans, and continue in-office audit communications with staff while proceeding towards compliance with the orders.

The staff plans to conduct an onsite audit at CNS in accordance with the enclosed audit plan from May 23 - 26, 2016.

If you have any questions, please contact me at 301-415-3204 or by e-mail at John.Hughey@nrc.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Hughey", is written over a light gray horizontal line.

John D. Hughey, Project Manager  
Orders Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket No.: 50-298

Enclosure:  
Audit plan

cc w/encl: Distribution via Listserv

## **Audit Plan Cooper Nuclear Station**

### **BACKGROUND AND AUDIT BASIS**

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design-Basis External Events" and Order EA-12-051, "Issuance of Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation," (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12054A736 and ML12054A679, respectively). Order EA-12-049 directs licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool (SFP) cooling capabilities in the event of a beyond-design-basis external event (BDBEE). Order EA-12-051 requires, in part, that all operating reactor sites have a reliable means of remotely monitoring wide-range SFP levels to support effective prioritization of event mitigation and recovery actions in the event of a BDBEE. The orders require holders of operating reactor licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* Part 50 to submit for review, Overall Integrated Plans (OIPs) including descriptions of how compliance with the requirements of Attachment 2 of each order will be achieved.

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Enclosure

The ongoing audit process, to include the in-office and onsite portions, allows the staff to assess whether it has enough information to make a safety evaluation of the Integrated Plans. The audit allows the staff to review open and confirmatory items from the mitigation strategies ISE, RAI responses from the spent fuel pool instrumentation (SFPI) ISE, the licensee's integrated plans, and other audit questions. Additionally, the staff gains a better understanding of submitted information, identifies additional information necessary for the licensee to supplement its plan, and identifies any staff potential concerns. The audit's onsite portion will occur prior to declarations of compliance for the first unit at each site.

This document outlines the onsite audit process that occurs after ISE issuance as licensees provide new or updated information via periodic updates, update audit information on e-portals, provide preliminary Overall Program Documents (OPDs)/Final Integrated Plans (FIPs), and continue in-office audit communications with staff while proceeding towards compliance with the orders.

Following the licensee's declarations of order compliance, the NRC staff will evaluate the OIPs, as supplemented, the resulting site-specific OPDs/FIPs, and, as appropriate, other licensee submittals based on the requirements in the orders. For Order EA-12-049, the staff will make a safety determination regarding order compliance using the Nuclear Energy Institute (NEI) guidance document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" Revision 0, issued in August 2012 (ADAMS Accession No. ML12242A378), or Revision 2, issued in December 2015 (ADAMS Accession No. ML16005A625). These guidance documents are endorsed by NRC Japan Lessons-Learned Directorate (JLD) interim staff guidance (ISG) JLD-ISG-2012-01 "Compliance with Order EA-12-049, 'Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events'" Revision 0 (ADAMS Accession No. ML12229A174), and Revision 1 (ADAMS Accession No. ML15357A163), with certain clarifications, as providing an acceptable means of meeting the order requirements. For Order EA-12-051, the staff will make a safety determination regarding order compliance using the NEI guidance document NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12240A307), as endorsed, with exceptions and clarifications, by NRC ISG JLD-ISG-2012-03 "Compliance with Order EA-12-051, 'Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12221A339), as providing one acceptable means of meeting the order requirements. Should the licensee propose an alternative strategy or other method deviating from the guidance, additional staff review will be required to evaluate if the alternative strategy complies with the applicable order.

#### AUDIT SCOPE

As discussed, onsite audits will be performed per NRR Office Instruction LIC-111, "Regulatory Audits," to support the development of safety evaluations. Site-specific OIPs and OPDs/FIPs rely on equipment and procedures that apply to all units at a site, therefore, audits will be planned to support the "first unit at each site." On-site audits for subsequent units at a site will be on an as-needed basis.

The purpose of the audits is to obtain and review information responsive to the CNS OIPs, as supplemented, open and confirmatory items from the mitigation strategies ISE, RAI responses

from the SFPI ISE, and to observe and gain a better understanding of the basis for the site's overall programs to ensure the licensee is on the correct path for compliance with the Mitigation Strategies and SFPI orders. These may include, but are not limited to:

- Onsite review and discussion for the basis and approach for detailed analysis and calculations (Orders EA-12-049, EA-12-051);
- Walk-throughs of strategies and laydown of equipment to assess feasibility, timing, and effectiveness of a given mitigating strategy or integration of several strategies (Order EA-12-049);
- Storage, protection, access, and deployment feasibility and practicality for onsite portable equipment (Order EA-12-049);
- Evaluation of staging, access, and deployment of offsite resources to include equipment provided by the Strategic Alliance for FLEX Emergency Response (SAFER) from the National SAFER Response Centers (NSRCs) (Order EA-12-049); and
- Review dimensions and sizing of the SFP area, placement of the SFP level instrumentation, and applicable mounting methods and design criteria (Order EA-12-051).

#### NRC AUDIT TEAM

<b>Title</b>	<b>Team Member</b>
Team Lead and Project Manager	John Hughey
Technical Support	Kevin Roche
Technical Support	Matthew McConnell
Technical Support	Khoi Nguyen
Technical Support	Bruce Heida
Technical Support	Joshua Miller
Region IV Observer	Ryan Alexander

#### LOGISTICS

The audit will be conducted onsite at CNS on May 23 - 26, 2016. Entrance and exit briefings will be held with the licensee at the beginning and end of the audit, respectively, as well as daily briefings of team activities. Additional details will be addressed over the phone. A more detailed schedule is provided below.

A private conference room is requested for NRC audit team use with access to audit documentation upon arrival and as needed.

## DELIVERABLES

An audit report/summary will be issued to the licensee within 90 days from the end of the audit.

## INFORMATION NEEDS

- Materials/documentation provided in responses to open or confirmatory items and RAIs in the ISEs;
- OPD/FIP (current version), operator procedures, FLEX Support Guidelines (FSGs), operator training plans, NSRC CNS Response Plan; and
- Materials/documentation for staff audit questions

To provide supplemental input to the ongoing audit of documents submitted to the NRC and made available via e-portal, the onsite audit will have three components: 1) a review of the overall mitigating strategies for the site, including, if needed, walk-throughs of strategies and equipment laydown of select portions; 2) a review of material relating to open or confirmatory items and RAIs from the ISEs, and staff audit questions; and 3) additional specific issues requested by NRC technical reviewers related to preparation of a safety evaluation. Each part is described in more detail below:

### Part 1 - Overall Mitigating Strategies and Program Review:

During the onsite audit, please be prepared to conduct a tabletop discussion of the site's integrated mitigating strategies and SFPI compliance program. This discussion should address the individual components of the plans, as well as the integrated implementation of the strategies including a timeline. The licensee team presenting this should include necessary representatives from site management, engineering, training, and operations that were responsible for program development, and will be responsible for training and execution.

Following the tabletop discussion, please be prepared to conduct walk-throughs of procedures and demonstrations of equipment as deemed necessary by NRC audit team members. Include representatives from engineering and operations that will be responsible for training and execution. At this time we expect, at a minimum, to walk-through the items below. Based on the tabletop presentations and audit activities, this list may change.



WALK-THROUGH LIST:

1. Walk-through a sample of strategies that will be delineated by specific NRC technical staff audit team members.
2. Walk-through of portable (FLEX) diesel generator (DG) procedures, to include power supply pathways, areas where manual actions are required, and electrical isolation.
3. Walk-through of building access procedures, to include any unique access control devices.
4. Strategy walk-through of transfer routes from staging and storage areas to deployment locations for both onsite and offsite equipment.
5. Strategy walk-through for core cooling and reactor coolant system inventory, to include portable pumping equipment, flow paths, and water storage locations and the related reactor systems analysis and calculations.
6. Walk-through of communications enhancements.
7. Walk-through of SFP area, SFPI locations, main control room, and related equipment mounting areas.

Part 2 – Specific Technical Review Items:

During the visit, audit items will be addressed from the licensee's ISEs open items (OI), confirmatory items (CI), and SFPI RAs; audit question list (AQ); and draft safety evaluation (SE) additional questions. Please provide documents or demonstrations as needed to respond to each item.

Part 3 – Specific Topics for Discussion:

1. Draft of CNS OPD/FIP
2. Training
3. Portable (FLEX) equipment maintenance and testing
4. NSRC Response Plan for CNS
5. Human Factors

### **Proposed Schedule**

#### **Onsite Day 1, Monday, May 23, 2016**

0800 Check in at site; Badging; Dosimetry

1000 Entrance meeting

1015 Licensee presentation of strategies

1230 Lunch

1330 NRC Audit Team Activities:

- Technical area break-out discussions between NRC and licensee staff in the areas of reactor systems, electrical, balance-of-plant/structures, SFPI, and others
- Review documents relating to open or confirmatory items, RAIs, codes, analyses, etc.
- NRC Mitigating Strategies/SFPI walk-throughs with licensee

1630 Team lead daily debrief/next day planning with licensee

#### **Onsite Day 2, Tuesday, May 24, 2016**

0800 Continue NRC Audit Team Activities

1200 Lunch

1300 Continue NRC Audit Team Activities

1630 Team lead daily debrief/next day planning with licensee

#### **Onsite Day 3, Wednesday, May 25, 2016**

0800 Continue NRC Audit Team Activities

1200 Lunch

1300 Continue NRC Audit Team Activities

1630 Team lead daily debrief/next day planning with licensee

#### **Onsite Day 4, Thursday, May 26, 2016**

0800 Continue NRC Audit Team Activities

1200 Lunch



- 1300 NRC Audit Team meeting
- 1430 NRC/Licensee pre-exit meeting
- 1630 NRC/Licensee exit meeting
- 1700 Audit closeout/departure

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If you have any questions, please contact me at 301-415-3204 or by e-mail at John.Hughey@nrc.gov.

Sincerely,

/RA/

John D. Hughey, Project Manager  
Orders 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.** ML16083A525

OFFICE	NRR/JLD/JOMB/PM	NRR/JLD/LA	NRR/JLD/JOMB/BC(A)	NRR/JLD/JOMB/PM
NAME	JHughey	SLent	TBrown	JHughey
DATE	03/29/2016	03/24/2016	03/30/2016	04/07/2016

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