

NRR-PMDAPEm Resource

From: Wengert, Thomas
Sent: Tuesday, November 29, 2016 1:35 PM
To: Shaw, Jim D.
Cc: Van Der Kamp, David W.; Flaherty, James R.; Martinez Navedo, Tania
Subject: Cooper Nuclear Station - Formal Request for Additional Information Concerning License Amendment Request to Adopt TSTF-425 Revision 3 (CAC MF7498)

Formal Request for Additional Information

On November 22, 2016, the U.S Nuclear Regulatory Commission (NRC) staff sent Nebraska Public Power District (NPPD) the draft Request for Additional Information (RAI) provided below. This RAI relates to a license amendment request to adopt Technical Specifications Task Force (TSTF)–425, Revision 3, “Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force Initiative 5b,” for the Cooper Nuclear Station (CNS).

NPPD subsequently informed the NRC staff that the information requested by the NRC staff was understood and that no additional clarification of the RAI was necessary. NPPD agreed to provide a response to this **formal** RAI within 30 days from the date of this correspondence. The NRC staff also informed NPPD that a publicly available version of this formal RAI would be placed in the NRC’s Agencywide Documents Access and Management System (ADAMS).

By letter dated March 22, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16110A425), Nebraska Public Power District (the licensee) requested an amendment to the Operating License for Cooper Nuclear Station (CNS). The proposed amendment would adopt Technical Specifications Task Force (TSTF)–425, Revision 3, “Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force Initiative 5b,” and modify the CNS Technical Specifications by relocating specific surveillance frequencies to a licensee-controlled program with the implementation of Nuclear Energy Institute 04-10, “Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies.” The U.S. Nuclear Regulatory Commission (NRC) staff requires additional information to complete its review of this license amendment request, as detailed below:

Regulatory Requirements:

10 CFR 50.36(c)(3), “Surveillance Requirements,” states that surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

Draft Request for Additional Information (RAI) EEEB-1:

1. The CNS submittal dated March 22, 2016, Attachment 3, page 3.8-18, Surveillance Requirement (SR) 3.8.4.7, shows a deletion (stricken language below) in Note 1 that pertains to the testing of the safety-related batteries:

The modified performance discharge test in SR 3.8.4.B8 may be performed in lieu of the service test in SR 3.8.4.7 ~~once per 60 months~~.

The licensee provided the following justification for the change in Page 3, Subsection 2.2.3, of Attachment 1:

CNS TS SR 3.8.4.7, Note 1, is being revised to delete the frequency of “once per 60 months.” This change is consistent with the latest revision of NUREG-1433. CNS TS SR 3.8.4.7 reflects the surveillance requirement of [Standard Technical Specification] STS SR 3.8.4.3 which contains a similar Note. However, the STS SR 3.8.4.3 Note 1 does not contain the reference to the Frequency of the modified performance discharge test. This change allows the modified performance discharge test in CNS TS SR 3.8.4.8 to be performed in lieu of the service test in CNS TS SR 3.8.4.7 at the Frequency established in the [Surveillance Frequency Control Program] SFCP.

The justification provided by the licensee is administrative in nature. The language proposed to be deleted is a technical change that is part of the condition allowing the licensee to perform a modified performance test in lieu of a service test. Please provide the technical basis for the change, including confirmation that the modified performance discharge test completely encompasses the load profile of the battery service test, and that the intent of the service test is to verify the battery capacity to supply the design basis load profile.

This RAI is identified as draft at this time to confirm your understanding of the information that the NRC staff needs to complete its evaluation. If this request for information is understood, please respond to this request for additional information within 30 days of the date of this request. Please contact me if you would like to arrange a conference call to clarify this request for information.

Regards,

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