

Nebraska Public Power District

GENERAL OFFICE
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December 4, 1979

Mr. Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Mark I Containment Program --
NRC Acceptance Criteria for the Mark I Long Term Program

Reference: 1) Letter, L. J. Sobon to D. G. Eisenhut dated 11/30/79, *
"NRC Acceptance Criteria for the Mark I Long Term
Program"

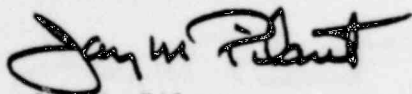
Dear Mr. Eisenhut:

On behalf of the Mark I Owners Group, General Electric Company forwarded the referenced letter which formalized a commitment to perform a limited number of additional confirmatory full scale condensation oscillation tests and expressed concerns relative to specific NRC acceptance criteria. Nebraska Public Power District concurs with the intent of the GE letter and requests that it be included on the Cooper Nuclear Station docket.

In addition to those concerns itemized in the referenced letter, the District has a concern regarding an aspect of the NRC criteria relating to the submerged drag loads. In certain areas the application of the criteria results in the requirement for containment system modifications which do not necessarily increase the level of safety or satisfy the primary objective of the Long Term Program, i.e., restore the original intended design safety margins for the Cooper Nuclear Station containment system. Following action by the NRC Staff in response to the requests contained in the referenced letter, it is anticipated that a plant unique meeting with the Staff will be required to discuss alternative criteria and load definition methodology for Cooper Nuclear Station.

If you have any questions regarding the District's concerns, please do not hesitate to contact me.

Very truly yours,



Jay M. Pilant
Director of Licensing
and Quality Assurance

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