

Nebraska Public Power District

GENERAL OFFICE
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October 17, 1979

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

Subject: Three Mile Island Followup Actions
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

Reference: 1) Letter from NRC to All Operating Nuclear Power Plants
Dated 9/13/79, "Follow-Up Actions Resulting from the
NRC Staff Reviews Regarding the Three Mile Island
Unit 2 Accident"

Dear Mr. Eisenhut:

In Reference 1 Nebraska Public Power District was requested to implement the actions contained in NUREG-0578, as modified and/or supplemented by items (a) through (f). A commitment to meet these requirements per the implementation schedule provided in Enclosure 6 was requested.

The owners of General Electric Boiling Water Reactors have reviewed all relevant material on the subject and have concluded that the issue of NUREG-0578 implementation can best be handled within the framework of the currently existing General Electric Boiling Water Reactor Owners Group, which was created specifically to address the issues raised by the Three Mile Island accident of significance to boiling water reactors.

Well defined acceptance criteria for many of the recommendations of NUREG-0578 are needed in order to ensure timely implementation. The recent clarification meetings and discussions have been of benefit, but others may be necessary to develop adequate acceptance criteria. These acceptance criteria, when fully developed, may impact implementation schedules due to hardware availability as well as affecting the ability to optimize utilization of scheduled refueling outages for such implementation. Thus, we believe a degree of flexibility is necessary in the implementation schedules for good cause shown. However, within the constraints described above, it is our intent to meet the requirements and schedules of NUREG-0578 described in the above reference.

The Owners Group intends to work as a unit to evolve detailed schedules and acceptance criteria for the majority of the NUREG items. During the next month we will be working along with other members of the Owners

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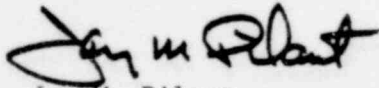
Group to evolve detailed acceptance standards for many of the NUREG-0578 action items that must be in place by January 1, 1980. It is anticipated that these acceptance standards to which Nebraska Public Power District is willing to commit, will be available by November 15. At that time we will be submitting them to you and referencing them as the accepted standard where it is appropriate for our plant. Following that submittal it may be appropriate for us to meet with you as part of our Owners Group to discuss the details and schedules for NUREG implementation for Cooper Nuclear Station to the extent that it can be handled as an Owners Group item. The chairman of our Owners Group will be in contact with you to establish a set of communication guidelines to govern this activity and to schedule a meeting, should it be determined that such a meeting is necessary.

At the NRC Topical Meeting on remote high-point venting October 11, 1979, each utility was requested to provide plant specific information in this regard. Enclosure 1 contains the information for Cooper Nuclear Station.

Reference 1 also contains a requirement that we commit to comply with each of the requirements of Enclosure 7 in accordance with the implementation schedules shown in Enclosure 8. As stated above, it is our intent to meet the requirements and schedules of NUREG-0578 as described in the reference and that commitment includes the implementation requirements of Enclosures 7 and 8.

We trust this letter is responsive to your requirements at this time. If additional clarification of our position is necessary, please do not hesitate to contact me.

Sincerely,



Jay M. Pilant
Director of Licensing
and Quality Assurance

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JDW/cmk

ENCLOSURE 1

REMOTE MANUAL HIGH POINT VENTING

COOPER NUCLEAR STATION

Relief valves operable from control room

Location: Main Steam Line

Number: 6

Safety grade: Yes

Vessel head vent valves operable from control room: Yes

Normally open vessel head vent line to main steam: Yes

Steam turbine driven RCIC: Yes

Steam turbine driven HPCI: Yes

There are no other means of "high point" venting in addition to the above methods.

The "typical" venting system presented by General Electric at the Topical Meeting on NUREG-0578 Implementation October 11, 1979 applies to Cooper Nuclear Station.

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