



## Nebraska Public Power District

GENERAL OFFICE  
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NLS9000081  
March 1, 1990

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Generic Letter 89-16  
Installation of a Hardened Wetwell Vent  
Cooper Nuclear Station  
Docket No. 50-298, DPR-46

Reference: 1) Letter from P. W. O'Connor (NRC) to G. A. Trevors (NPPD),  
dated January 30, 1990, "Review of NPPD's Response to Generic  
Letter 89-16 (TAC No. 74863)"  
2) Letter NLS8900400 from G. A. Trevors to U.S. NRC, dated  
October 27, 1989, "Response to Generic Letter 89-16"

Gentlemen:

The Nuclear Regulatory Commission, in Reference 1, requested the Nebraska Public Power District (the District) to confirm its intention to install a hardened wetwell vent. Also, Reference 1 requested the District to re-evaluate and revise the installation schedule showing all actions complete by January 1993, or provide justification for the schedule proposed in Reference 2.

The District confirms its intention given in the initial response to NRC Generic Letter 89-16 (Reference 2) to install a Hardened Wetwell Vent. However, this installation will be completed on the schedule previously proposed, during the Spring 1993 refueling outage. The design and installation of the vent will be in accordance with the BWR Owners' Group generic design criteria, which is scheduled to be forwarded for NRC review and comment by April 30, 1990. The District cannot commit to installing a Hardened Vent ahead of the schedule given in the initial response for the following reasons:

- a. There is no refueling outage scheduled for 1992. Therefore, in order to meet the requested due date of January 1993, the only acceptable opportunity for installation would be the 1991 refueling outage. The timing of the 1991 outage and the long lead time for manufacturing would mean that major components, such as isolation valves, piping, etc., would have to be ordered before the detailed design could be

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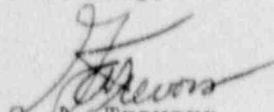
finalized and approved. This, combined with the time required to complete NRC review of the generic design criteria and the time necessary to complete site specific engineering, does not allow installation during the 1991 outage.

- b. The detailed design may be impacted by plant specific issues identified during the production of the IPE (PRA) for Cooper Nuclear Station. The IPE is scheduled for completion in October 1991, which is after the start of the 1991 outage. Since the IPE results may dictate changing the design and procurement specifications for the project, it would not be prudent, from a design, financial and safety standpoint, to commence final design approval or installation until after the IPE is complete.

The District will, therefore, install a Hardened Vent on the Cooper Nuclear Station (CNS) Primary Containment by the start-up from the 1993 refueling outage, currently scheduled for the Spring of 1993. This results in CNS operating only 1 - 2 months beyond January 1993, prior to shutting down to install the wetwell vent. The District is prepared to work with the BWR Owners' Group and the NRC Staff towards resolving the concerns over the BWR Mark I Containment issues and considers the District's schedule to be in conformance with the agreed intent of the direction proposed by the NRC Staff.

Should you have any questions concerning this response, please contact this office.

Sincerely,

  
G. A. Trevors  
Division Manager  
Nuclear Support

GAT/mtb:jw

cc: U.S. Nuclear Regulatory Commission  
Region IV  
Arlington, TX

NRC Resident Inspector Office  
Cooper Nuclear Station