



## Nebraska Public Power District

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LQA8200152

June 4, 1982

50-285

Office of Nuclear Reactor Regulation  
Attn: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Post TMI Requirements Response  
(Generic Letter No. 82-10)

Dear Mr. Eisenhut:

Your letter of May 5, 1982 requested commitments to implement on a timely basis the NUREG-0737 items remaining to be completed after March 1, 1982. Enclosure 1 contains the information you requested.

If you should require further clarification on any of the information provided, please contact me.

Sincerely,

Jay M. Pilant  
Division Manager of Licensing  
and Quality Assurance

JMP:JDW:cmk

Enclosure

A046

## NUREG 0737 Items Requiring Licensee Response

Scheduled to be completed after March 1, 1982

### I.A.1.3.1 - Limit Overtime

Administrative Procedures are to be revised by October 1, 1982 to limit overtime in accordance with NRC Policy Statement issued by Generic Letter No. 82-02, dated February 8, 1982: This item is complete. The letter D. B. Vassallo to J. M. Pilant dated April 2, 1982 stated that the Staff has reviewed Admin. Procedure 1.4, and have determined that actions adequately address the shift manning overtime limit requirement.

### I.A.1.3.2 - Minimum Shift Crew

By July 1, 1982 it is required to augment current shift staffing to conform with minimum levels set forth on page 3-9 of NUREG 0737: This item is complete. By letter dated December 30, 1980 the District submitted as Enclosure 3 discussion of the following items: 1) STA Training Program; 2) STA Requalification Program; 3) Discussion of STA Position; 4) Plan for Filling the STA Function Beginning February 1, 1981; and 5) On-Call and Re-Call Procedure. In a letter dated January 6, 1982 Mr. T. A. Ippolito stated "In enclosure 3 of your letter dated December 30, 1980 you identified your intended shift manning which included an additional licensed operator (RO) on shift by July 30, 1981. The shift manning as identified in that letter meets the requirements of NUREG 0737, item I.A.1.3.2." Since the District intends to continue with this approved program after July 1, 1982, and since the various staffing requirements in NUREG 0737 are subject to interpretation by various NRC inspectors, the District respectfully requests immediate notification by the Office of Nuclear Reactor Regulation if the Staff does not concur that this item is completed at CNS.

### I.C.1 - Revised Emergency Procedures

The Emergency Procedures are to be revised by the first refueling outage after October 1, 1982: By letter dated April 8, 1982 from T. J. Dente to D. G. Eisenhut the BWR Owners Group stated that Revision 2 to the BWR Emergency Procedure Guidelines would be submitted to the NRC for approval in June 1982. It must be recognized that implementation of these procedures at CNS is contingent upon expeditious review and approval by the NRC staff. At the present time it is anticipated that the procedures will be implemented by the refueling outage in the spring of 1983 if the Owners Group and the NRC concur in the adequacy of the EPGs by October 1, 1982.

### I.D.1 - Control Room Design Review

Under development; no reply needed at this time.

### I.D.2 - SPDS

Under development; no reply needed at this time.

#### II.B.1 - RCS Vents

Although no reply is needed at this time, and assuming that the issue is 10CFR50.44 and not 10CFR44, the District is constrained to inform the Staff that due to the various technical issues involved in this item, the necessary analyses and/or installation of dedicated hydrogen penetrations cannot be completed during the first refueling outage after July 1, 1982.

#### II.B.2.3 - Plant Shielding Pt. 3 Environmental Qualification

No reply needed; however, it should be noted that II.B.2.3 (Pt. 3) relates to Dose Rate Criteria and II.B.2.4 (Pt. 4) relates to Radiation Qualification of Safety-Related Equipment.

#### II.F.2 - Instrumentation for Inadequate Core Cooling

Under development; no reply needed at this time.

#### II.K.3.18 - ADS Actuation

As established by letter D. Eisenhut to T. J. Dente dated April 23, 1982, owners are to submit revised position on need for modifications by September 30, 1982: The District is working with the BWR Owners Group towards submittal of the revised position by the required date.

#### II.K.3.30 and 31 - SB LOCA Analysis

Submit Plant Specific Analyses one year after Staff approval of model: This item is complete. As stated in the District's response of December 28, 1981, the existing Plant Unique ECCS Analysis filed and approved on the CNS Docket satisfies this item.

#### III.A.1.2 - Staffing Levels for Emergency Situations

The requirement is to provide for augmentation of staffing in accordance with Generic Letter 81-10 dated February 18, 1981 by July 1, 1982: Please see the response to I.A.1.3.2 above. In a letter dated October 5, 1981 from J. M. Pilant to K. V. Seyfrit, the District provided the results of the study to demonstrate the 30 and 60 minute augmentation for emergencies. Since the issue of "exactly 30 minutes" is subject to interpretation by various NRC inspectors, the District respectively requests immediate notification by the Office of Nuclear Reactor Regulation if the Staff does not concur that this item is completed at CNS.

#### III.A.1.2 - Upgrade Emergency Support Facilities

Modifications are to be completed by October 1, 1982: The District submitted the ERF Conceptual Designs in a letter dated June 9, 1981. A full scale exercise was held in March 1982. Although we have not received the appraisal report resulting from the exercise, the District understands that the size of the EOF, protection factor of the EOF, and size of the TSC are suspect. It should be noted that the District initially constructed an Alternate EOF in Brownville, Nebraska, which

we no longer intend to utilize in light of the evolving NRC requirements. The District has initiated efforts to modify the near-site EOF and TSC to meet the requirements as we understand them. It is anticipated that these deficiencies will be corrected in time for the exercise to be conducted in 1983. The conceptual designs for the modified EOF will be provided in mid-June 1982 for NRC concurrence. While awaiting the exercise report, the District is also proceeding with development of the Alternate EOF (AEOF), located approximately 11 miles from the site at Auburn, Nebraska. With the exception of full communications capability, the AEOF could be utilized by the 10-1-82 date. Pending receipt of NRC concerns and resolutions regarding emergency communications, full capabilities should be in place and operational by 1-1-83.

#### III.A.2.2 - Meteorological Data

Modifications are to be completed by October 1, 1982: As the Staff is aware, the District is presently utilizing an interim meteorological model performed on a computer at the General Office. The Class A model will be performed on the new process computers for CNS which will be installed as part of the Plant Management Information System (PMIS). The PMIS will also perform functions of the SPDS, Radiological Environmental Tech Specs (RETS), etc. The complete status of the present interim meteorological system at CNS will be provided in a submittal approximately mid-June 1982. It is the District's position that this interim system adequately meets the provisions of III.A.2.2 until the PMIS is completed to encompass all NRC requirements.

#### III.D.3.4 - Control Room Habitability

Facility modifications as identified by licensee's study were to be proposed: This item is complete. Enclosure 5 to the District's response of December 30, 1980 submitted the results of our review. Letter from D. B. Vassallo dated February 24, 1982 confirmed that our design meets the criteria.