

From: Wengert, Thomas
Sent: Wednesday, March 11, 2020 2:03 PM
To: Dewhirst, Linda R.
Cc: Van Der Kamp, David W.; Dixon-Herrity, Jennifer
Subject: Cooper Nuclear Station - Acceptance of Requested Licensing Action RE: LAR to Adopt EAL Scheme Pursuant to NEI 99-01, Rev. 6 (EPID L-2020-LLA-0028)

By letter dated February 18, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20055D877), Nebraska Public Power District (the licensee) submitted a license amendment request for Cooper Nuclear Station (CNS). The amendment request proposes to revise the current CNS Emergency Action Level (EAL) scheme, which is based on the Nuclear Energy Institute (NEI) guidance established in NEI 99-01, Revision 5, "Methodology for Development of Emergency Action Levels" (ADAMS Accession No. ML080450149). The licensee is proposing to adopt the EAL scheme based on the guidance provided in NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," which has been endorsed by the U.S. Nuclear Regulatory Commission (NRC) (ADAMS Accession No. ML12346A463).

The purpose of this e-mail is to provide the results of the NRC staff's acceptance review of the amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed license amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that the licensing request will take approximately 300 hours to complete. The NRC staff expects to complete this review in approximately 12 months, which is March 2021. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me.

Tom Wengert
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U. S. Nuclear Regulatory Commission
NRR/DORL/LPL4
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Hearing Identifier: NRR_DRMA
Email Number: 474

Mail Envelope Properties (MN2PR09MB48731F51D499F2F058F296EC8FFC0)

Subject: Cooper Nuclear Station - Acceptance of Requested Licensing Action RE: LAR
to Adopt EAL Scheme Pursuant to NEI 99-01, Rev. 6 (EPID L-2020-LLA-0028)
Sent Date: 3/11/2020 2:03:06 PM
Received Date: 3/11/2020 2:03:00 PM
From: Wengert, Thomas

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Recipients:
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Tracking Status: None

Post Office: MN2PR09MB4873.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	3831	3/11/2020 2:03:00 PM

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Priority: Normal
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