



## Nebraska Public Power District

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July 3, 1991

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

Subject: Generic Letter 88-01 Technical Specification Changes  
Cooper Nuclear Station  
NRC Docket No. 50-298, DPR-46

References:

- 1) NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping-10CFR50.54(f), Generic Letter 88-01, dated January 25, 1988.
- 2) Letter from G. A. Trevors (NPPD) to U.S. NRC Document Control Desk dated July 24, 1989, "Response to Generic Letter 88-01"
- 3) Letter from G. A. Trevors (NPPD) to U.S. NRC Document Control Desk dated April 30, 1990, "Supplemental Response to Generic Letter 88-01"
- 4) Letter from P. W. O'Connor (NRC NRR) to G. R. Horn (NPPD) dated February 25, 1991, "Review of Nebraska Public Power District's Response to Generic Letter 88-01"

Gentlemen:

Generic Letter 88-01 (Reference 1) promulgated NRC positions on various topics associated with intergranular stress corrosion cracking (IGSCC) in certain BWR piping. Two of these positions concerned revising plant Technical Specifications to incorporate new requirements regarding in-service-inspection (ISI) of certain BWR piping and unidentified leakage rate increases in the drywell. The Nebraska Public Power District (District) responded to these positions contained in Generic Letter 88-01 by letters dated July 24, 1989, (Reference 2) and April 30, 1990, (Reference 3). In these letters, the District did not commit to modifying the Cooper Nuclear Station Technical Specifications, in part, because of the previous corrective actions undertaken for IGSCC concerns at CNS and because of a commitment made to incorporate the staff positions on schedule, methods and personnel, and sample expansion into the CNS ISI program. In Reference 4, the NRC stated that the District's response to these two staff positions regarding Technical Specifications was unacceptable and that these matters would be addressed in future correspondence.

In reply to the NRC response contained in Reference 4, the District is reevaluating our response to the staff's positions on the above Technical Specification changes. The District understands that a supplement to Generic Letter 88-01 may be available in the near future that would provide additional guidance with regard to the subject Technical Specification changes. The information contained in this supplement will be considered in our reevaluation of this subject. After this supplement becomes available, the District will

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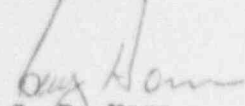
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provide a response concerning Technical Specification changes associated with Generic Letter 88-01.

If you have any questions, please contact me at this office.

Sincerely,



G. R. Horn  
Nuclear Power  
Group Manager

/dls

cc: Regional Administrator  
NRC-Region IV  
Arlington, TX

NRC Resident Inspector  
Cooper Nuclear Station