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Nebraska Public Power District

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December 2, 1983

Director of Nuclear Reactor Regulation
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Mr. Domenic B. Vassallo, Chief

Subject: Response to 10CFR50, Appendix R, "Fire Protection of Safe Shutdown Capability - Volume III"

Reference: (1) Letter from D. B. Vassallo to L. G. Kuncl, dated September 21, 1983, "Exemption Requests - 10CFR50.48 Fire Protection and Appendix R to 10CFR Part 50."

Dear Mr. Vassallo:

The purpose of this letter is to provide a description of the modifications for alternate shutdown capability independent of the Control Room and the Auxiliary Relay Room. This response was required to be sent in accordance with Reference (1).

The required information is contained in the enclosure to this letter which is Volume III of the subject response. The enclosed report describes the fire protection features for the safe shutdown systems and circuits at Cooper Nuclear Station (CNS) and the relationship of these features to the requirements of 10 CFR 50 Appendix R. The results of this evaluation indicate that an alternative shutdown system can be defined and implemented to achieve regulatory compliance in plant areas where verbatim Section III.G.2 compliance cannot be efficiently met. Conceptual designs are also presented which describe the system and fire protection modifications which will be implemented to achieve compliance with Appendix R.

In support of this objective, this report builds upon the previous fire protection reviews, Appendix R exemption requests by NPPD and the exemptions granted by the Nuclear Regulatory Commission (NRC). Specifically, this report describes the proposed modifications for the alternative shutdown capability

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that is independent of the control circuits located in the Control Room, Cable Spreading Room, Cable Expansion Room, Auxiliary Relay Room, and the northeast corner of the 903' level of the Reactor Building.

If additional clarification is required regarding this submittal, please do not hesitate to contact me.

Sincerely,

Jay M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP/gmc:cjb5/1
Enclosure

cc: B. Siegel w/enclosure
U.S. Nuclear Regulatory Commission

J. Collins w/enclosure
U.S. Nuclear Regulatory Commission - Region IV