



Nebraska Public Power District

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January 24, 1983

50-298

Director of Nuclear Reactor Regulation
Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: Safety Evaluation for Environmental Qualification of
Safety-Related Electrical Equipment

Reference: 1) Letter from D. B. Vassallo to J. M. Pilant
dated December 20, 1982, same subject.

The District has reviewed the NRC's Safety Evaluation, Reference 1, and its attached Technical Evaluation Report (TER) prepared by the Franklin Research Center (FRC). The TER evaluated NPPD's September 4, 1981, response to the NRC's previous Safety Evaluation Report, dated June 6, 1981, and our subsequent submittal (dated February 22, 1982) of additional information requested by the NRC for FRC's evaluation. Environmental qualification of safety-related electrical equipment exposed to harsh environments in accordance with the requirements of IE Bulletin 79-01B (which included the DOR Guidelines and NUREG-0588) is included within the scope of the District's Functional Assurance Program for Cooper Nuclear Station.

The District has determined, and is in agreement with your staff's conclusion, that continued operation of Cooper Nuclear Station until completion of our environmental qualification program does not present undue risk to the public health and safety. Conformance with the above requirements and satisfactory completion of environmental qualification under the District's Functional Assurance Program will ensure compliance with the Commission Memorandum and Order CLI-80-21 of May 23, 1980. We conclude that there is reasonable assurance of continued safe operation of Cooper Nuclear Station pending

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completion of environmental qualification actions. This conclusion is based on the following:

- (1) There are no outstanding items which would require immediate corrective action to assure safety of station operation.
- (2) Some of the items found deficient have been or are being replaced or relocated, thus improving the station's capability to function following a LOCA or HELB.
- (3) The harsh environmental conditions for which this equipment must be qualified result from low-probability events. The events which might reasonably be anticipated during this limited period would lead to less demanding service conditions for this equipment.

As required by the December, 1982, Safety Evaluation, we have reviewed all items listed in the TER in NRC Categories I.b and II.a. Category II.b does not apply since no items were listed. These items have been put into three groups as described below:

Group 1 - Justifications for continued operation for equipment in this group were provided in submittals subsequent to the NRC's previous Safety Evaluation Report (6/8/81). These items are included in our on-going Functional Assurance Program for further qualification evaluation and appropriate corrective action if required.

The District hereby reaffirms justification for continued operation for the following items (listed using FRC equipment identifiers):

5, 18, 21, 26, 27, 29, 53, 56, 57, 58, 59, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 101, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 153, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 193.

Group 2 - The District hereby affirms that continued operation of the following equipment does not present undue risk to the public health and safety. This conclusion is based on review of newly identified TER deficiencies and applicable equipment. Review of initial evaluations and equipment materials of construction, similarity to other tested or qualified components, potential failure modes, and operating function provide

reasonable assurance that the equipment listed below will perform satisfactorily until qualification evaluation and corrective action, if required, is completed under our Functional Assurance Program:

3, 14, 40, 41, 42, 43, 44, 46, 47, 48, 49, 50, 52, 60, 61, 62, 63, 102, 104, 105, 106, 108, 109, 110, 111, 112, 113, 114, 117, 122, 123, 154, 187, 191, 194.

Group 3 -

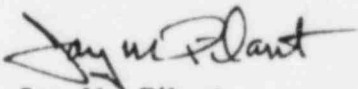
We hereby affirm that continued operation of the following equipment does not present undue risk to the public health and safety. This affirmation is based on review of newly identified TER deficiencies, applicable equipment, and our previous SER Response and subsequent submittals. We disagree with all newly identified TER deficiencies and conclude that all items listed below are completely qualified to DOR Guidelines and NUREG-0588 based on previous submittals or qualification documentation prepared subsequent to our previous submittals but not yet reviewed by NRC or FRC:

6, 25, 33, 36, 37, 38, 39, 51, 54, 55, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 103, 107, 115, 116, 121, 129, 130, 133, 145, 146, 147, 150, 151, 152, 190, 192.

Although these items are included in our Functional Assurance Program, we currently have no plans to further evaluate their qualification.

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

Sincerely,



Jay M. Pilant
Division Manager of Licensing &
Quality Assurance

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