



Nebraska Public Power District

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NLS8400206

July 20, 1984

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

Reference: 1) Letter from J. M. Pilant to D. G. Eisenhut dated
June 29, 1984, "Response to Generic Letter 84-09,
Hydrogen Recombiner Capability" (NLS8400184)

Dear Mr. Eisenhut:

Subject: Additional Response to Generic Letter 84-09,
Hydrogen Recombiner Capability
Cooper Nuclear Station
NRC Docket 50-298, DPR-46

The District responded to Generic Letter 84-09 by submitting
Reference 1. It has been determined that page 2 of our
response would be more complete if amplified to contain additional
discussion regarding the pneumatic control systems within the
containment. Accordingly, enclosed is a replacement page 2 for
the previously submitted response in Reference 1.

Sincerely,

Jay M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP/jdw:emz11/5
Enclosure

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Criterion 1

The plant has Technical Specifications (limiting conditions for operation) requiring that, when the containment is required to be inerted, the containment atmosphere be less than four percent oxygen.

Response 1

CNS Technical Specification 3.7.A.5 meets this requirement.

Criterion 2

The plant has only nitrogen or recycled containment atmosphere for use in all pneumatic control systems within containment.

Response 2

In Sections 2.0 and 3.4 of the attachment to Reference 3, the Staff recently reviewed and summarized the normal (and backup) gas supply for the pneumatically actuated ADS valves at CNS. Nitrogen from the containment inerting system is the normal gas supply. This nitrogen gas supply is also used in the MSIV pneumatic control system within the containment. As detailed in FSAR Questions 5.7 and 5.19, the other air systems were modified to route all return air outside the containment. To be in verbatim compliance with the above Criterion 2, the District will need to either isolate these air lines outside of the containment or modify the gas supply to utilize nitrogen. If the Staff determines that a design change is required, these modifications will be completed during the Cycle 11 refueling outage (i.e., the next refueling outage after the September, 1984, outage).

Criterion 3

There are no potential sources of oxygen in containment other than that resulting from radiolysis of the reactor coolant. Consideration of potential sources of in-leakage of air and oxygen into containment should include consideration of not only normal plant operating conditions but also postulated loss-of-coolant accident conditions. These potential sources of in-leakage should include instrument air systems, service air systems, MSIV leakage control systems, purge lines, penetrations pressurized with air, and inflatable door seals.

Response 3

The specified potential sources of air and oxygen in-leakage into the containment have been considered:

Instrument Air Systems - See the response to Criterion 2 above.

Service Air Systems - The service air system at CNS is isolated from the drywell and torus when the containment is required to be inerted.

MSIV Leakage Control Systems - CNS does not have this type of system which utilizes an air source.