



Nebraska Public Power District

GENERAL OFFICE
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NSD920108
January 31, 1992

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

Subject: Response to NRC Generic Letter 91-11
Resolution of Generic Issues 48, "LCO's for Class 1E Vital Instrument
Buses," and 49, "Interlocks and LCO's for Class 1E Tie Breakers"
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

Gentlemen:

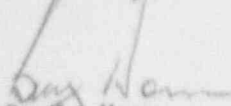
NRC Generic Letter (GL) 91-11, "LCO's for Class 1E Vital Instrument Buses and Interlocks and LCO's for Class 1E Tie Breakers", was issued on July 18, 1991 and received by Nebraska Public Power District (District) on August 5, 1991. The Generic Letter contained recommended actions for the Resolution of Generic Issues 48 ("LCO's for Class 1E Vital Instrument Buses"), and 49 (Interlocks and LCO's for Class 1E Tie Breakers").

As requested in the Generic Letter, the District has investigated and ensured that the Cooper Nuclear Station (CNS) procedures address time limitations and surveillance requirements for vital instrumentation buses, and inverters or other onsite power sources that supply the vital instrument buses (Generic Issue 48). In addition the District has investigated the vital instrument buses and redundant Class 1E buses relative to problems which could be created by the tie breakers. We have verified that CNS has no tie breakers of the type discussed in the Generic Letter, as clarified by the attached telephonic conversation with the NRC staff, that can connect normally independent, redundant Class 1E AC and DC buses. As such, the concerns of Generic Letter 91-11 do not apply to Cooper Nuclear Station.

This response is submitted under oath in accordance with the provisions of 10CFR50.54(f).

Please contact us if you have any questions.

Sincerely,


G. R. Horn
Nuclear Power Group Manager

GRS:tja:GL91-11.res
Attachment

cc: Regional Administrator
USNRC - Region IV

NRC Resident Inspector
Cooper Nuclear Station

9202100074 920131
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PDR

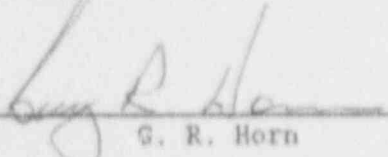
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STATE OF NEBRASKA)
) ss
PLATTE COUNTY)

G. R. Horn, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this information on behalf of Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.

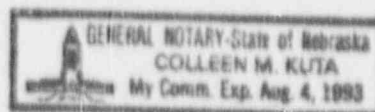


G. R. Horn

Subscribed in my presence and sworn to before me this 31st day of
January, 1992.



NOTARY PUBLIC



NEBRASKA PUBLIC POWER DISTRICT
RECORD OF TELEPHONE CONVERSATION

Sheet 1 of 1
Date JAN 9, 1992
Time 0930 CST

FROM: Name: R. Foust, R. Moberly, M. Dean	TO: Name: O. Chopra
Company: NPPD - CNS	Company: NRC - Washington, DC
SUBJECT: Generic Letter 91-11 - Divisional Bus Tie Breakers at CNS (NSD020009)	
TOPICS OF CONVERSATION: Mr. Chopra was contacted to provide additional information to aid in determining if CNS had bus tie breakers as that term is used in the Generic Letter. (Mr. Chopra was listed as the NRC information contact in the Generic Letter.) Rick Foust asked the following questions: Q: In regards to the definition of bus tie breaker, the CNS configuration has divisional DC panels and AC MCCs that can be transferred from 1 of 2 divisions to the other divisional power source using a single transfer switch. This is normally done during plant outages. This does not allow both DC divisions to be connected together at the same time. <div style="text-align: right;">AC OK RNF 1/14/92</div> A: Because this configuration cannot tie two redundant busses together at the same time, this would not be considered to be a bus tie breaker [as used in the Generic Letter]. Q: In the 125 VDC battery systems, CNS can place the "A" bus on the "B" battery. This is done with a single transfer switch. A: This is not in the same category of tie breakers that we are concerned about in this Generic Letter. Q: CNS can also transfer loads on an "A" [125 VDC] panel to the "B" battery bus. In this case, all of the "A" divisional loads for that panel would then be on the "B" divisional bus. This is done with a transfer switch for that panel. [Mr. Chopra requested that a simple drawing of this example be sent to him so that he could evaluate it better. Two sketches were sent to him, and he called Rick later in the day.] A: This is not a configuration to which the concerns of the Generic Letter apply. <div style="text-align: right;">Michael A. Dean 1/13/92 Michael A. Dean, PE Nuclear Licensing and Safety Supervisor</div>	

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