

## Nebraska Public Power District

GENERAL OFFICE  
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CNSS857088

February 15, 1985

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

ATTN: Mr. D. B. Vassallo, Chief  
Operating Reactors Branch No. 2

Dear Mr. Vassallo:

Subject: 10CFR50.49 Section (g), Request for Compliance  
Extension

- Reference:
- 1) Letter CNSS850033, L. G. Kuncel to  
D. B. Vassallo Dated January 28, 1985,  
"Certification of Compliance to 10CFR50.49,  
Environmental Qualification of Electric  
Equipment Important to Safety for Nuclear  
Power Plants (Generic Letter 84-24) Docket  
No. 50-298. DPR-46
  - 2) Exemption from Scheduler Requirements of  
10CFR50.49(g) Dated October 3, 1983

As the District previously documented in Reference 1, all equipment important to safety located in harsh environments at Cooper Nuclear Station will be qualified or replaced prior to plant start-up from the current outage except for the Reactor Equipment Cooling (REC) Pump Drive Motors. Due to the lack of vendor documentation for the presently installed rewind drive motors, the four REC drive motors will be replaced; however, procurement lead time will result in the motors arriving on site no earlier than July 3, 1985. This date is beyond the plant start-up date of approximately June 1, 1985, and the required date for final environmental qualification specified in Reference 2. With timely delivery of the motors, installation could be completed by November 15, 1985, while at power; therefore, in accordance with Section II of Reference 2 the District respectfully requests an extension of the deadline to November 30, 1985. Every effort will be made to improve on the above completion date.

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w/ check \$150<sup>00</sup>  
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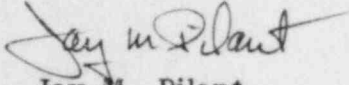
D. G. Eisenhut  
February 15, 1985  
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The Justification for Continued Operation (JCO) is attached.

In accordance with 10CFR170.12(c) an application fee of \$150 is enclosed.

Should you have any questions concerning the above, please contact my office.

Sincerely,



Jay M. Pilant  
Technical Staff Manager  
Nuclear Power Group

JMP/jdw:kc18/3

Attachment: JCO for Reactor Equipment Cooling Pumps Drive  
Motors

## JUSTIFICATION FOR CONTINUED OPERATION

### Reactor Equipment Cooling (REC) Pumps Drive Motors

Component ID: CIC; REC-MOT-RECPA, REC-MOT-RECPB, REC-MOT-RECPC, REC-MOT-RECPD

Description: Drive Motor for REC Pumps

Safety Function: The safety objective of the Reactor Equipment Cooling System (also known as the Reactor Building Closed Cooling Water System) is to provide cooling to the Core Standby Cooling Systems areas and the RHR Pumps.

Cause and Effect: The environmental qualification documentation for the rewinding of the REC Pump Motors could not be provided by the vendor; therefore, the motors cannot be qualified to IEEE 323-1974 Standards.

Justification for Continued Operation:

The purpose of the REC System is to provide cooling to critical and non-critical potentially contaminated components located in the Reactor Building and Radwaste Building. The REC system functions to separate the potentially contaminated loads from the service water which provides secondary cooling to the tube side of the heat exchanger. The system consists of (4) Horizontal Centrifugal Type, 1350 gpm Design Capacity Pumps with (4) 75 HP Pump Motors. The system is designed with sufficient redundancy so that no single system component failure can prevent the system objective.

In the highly unlikely event that one of the pump motor windings fail and renders that pump inoperable, the REC System has sufficient redundancy in two independent loops which can be interconnected through crossties equipped with isolation valves to provide adequate cooling. In addition, any common failure of the REC Pumps would not necessarily create a safety problem due to the availability of a seismically qualified backup system (Service Water System). The service water pumps are located outside of the potentially harsh environment of the Reactor Building, (Reference USAR X.8.1.5 and Burns & Roe Drawings 2031 and 2036). For the Service Water System to be necessary all four REC Pumps must fail since only one is needed and the REC loops can be interconnected (USAR Section X-6 verifies heat load capacity with only one REC Pump operable).

There is no interim concern for safety based on the preceding discussion. The current plan to resolve the qualification deficiency for the REC Pump Motors is to replace the REC Pump Motors with IEEE 323-1974 qualified Pump Motors that have the required documentation. This activity will be completed prior to November 30, 1985.