



# Nebraska Public Power District

GENERAL OFFICE  
P.O. BOX 497, COLUMBUS, NEBRASKA 68602-0499  
TELEPHONE (402) 564-6551  
FAX (402) 563-5551

NSD921098

November 10, 1992

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

Subject: Reactor Building Reentry for Emergency Support Procedures  
Cooper Nuclear Station  
NRC Docket No. 50-298, License No. DPR-46

Gentlemen:

In response to an item discussed in Inspection Report Number 50-298/92-11, the following information is being provided by the Nebraska Public Power District (District) regarding reentry into the Cooper Nuclear Station (CNS) reactor building as a result of the use of the CNS Emergency Operating Procedures (EOPs), and the use of the Emergency Support Procedures (ESPs) to carry out specific EOP actions. This letter contains information previously provided during a November 2, 1992, telephone conversation between the District and members of the NRC staff in which the District was requested to respond to a series of statements.

1. NRC Item.

Confirmation that no personnel reentry into the reactor building is required for any design basis accident.

NPPD Response.

Reentry into the reactor building is not required for the CNS design basis accidents as described in the CNS Updated Safety Analysis Report.

2. NRC Item.

For beyond design basis conditions in which the EOPs direct local operator actions, procedures are in place to ensure that a health physicist would accompany the response team to assess radiological conditions.

NPPD Response.

The present implementing procedures for the CNS Emergency Plan require a health physics technician to accompany teams that are sent out in the field. As a further enhancement, the procedures that direct EOP actions at local areas (e.g., reactor building) will be revised to require a health physics technician to accompany the response team when radiation levels are elevated or unknown. These procedures will be revised prior to startup from the 1993 refueling outage.

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3. NRC Item.

ESPs have been reviewed and evaluated to identify local action steps which could be prohibited due to high radiation levels to ensure that prioritized, alternative success paths exist and appropriate caution statements are properly located in the ESPs.

NPPD Response.

The CNS ESPs are presently undergoing an enhanced Verification and Validation (V&V) effort to identify local action steps which could be prohibited due to high radiation levels to ensure that "success paths" are appropriately categorized and prioritized, and that appropriate caution statements are located in the ESPs. This enhanced V&V effort and subsequent ESP revision approval will be completed prior to startup from the 1993 refueling outage.

NPPD notes that the term "success path" is normally associated with the EOPs used for pressurized water reactors. The CNS EOPs follow the BWR Owners Group Emergency Procedure Guidelines philosophy. An ESP provides the detailed instructions used by an operator to achieve an EOP action. The ESP may have instructions for several different methods which will achieve the desired action. Should circumstances prevent the completion of the required action of that EOP step, the EOPs have succeeding contingency steps which direct additional actions to be taken to prevent or mitigate further degradation of plant conditions. NPPD considers the combination of the instructions within the ESP used to accomplish a EOP action and the succeeding EOP actions to constitute a complete "success path."

4. NRC Item.

Personnel who would perform the aforementioned local actions receive appropriate training in this regard.

NPPD Response.

Personnel have been trained to require a health physics technician to accompany teams that are sent out into the field per the CNS Emergency Plan implementing procedures. Personnel will be trained on the revised procedures discussed in the response to item 3. This training will be completed within one full six week operator training cycle following startup from the 1993 refueling outage.

5. NRC Item.

A detailed Verification and Validation of the EOP and ESP steps which could be prohibited due to high radiation levels and the associated alternative action steps has been completed.

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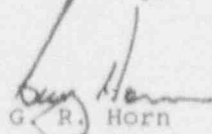
NPPD Response.

The V&V effort discussed in the response to item 3 will address this item.  
The completion schedule for this V&V is also provided in that response.

Copies to the NRC Region IV Office and the CNS Resident Inspector are also being provided in accordance with 10 CFR 50.4(b)(1).

Should you have any questions or require any additional information regarding this submittal, please contact me.

Sincerely,



G. R. Horn  
Nuclear Power Group Manager

GRH/MAD  
Attachments

cc: NRC Regional Office  
Region IV  
Arlington, TX

NRC Resident Inspector  
Cooper Nuclear Station