Nebraska Public Power District

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May 9, 1985

Director, Nuclear Reactor Regulation
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief

Subject: Appendix R Analysis of Cooper Nuclear Station

References: A) NRC Memorandum from L. S. Rubenstein dated December 3, 1982, "Use of the Automatic Depressurization System (ADS) and Low Pressure Coolant Injection (LPCI) to meet Appendix R Alternative Shutdown Goals."

B) Letter from J. M. Pilant to D. B. Vassallo dated June 28, 1982, "Appendix R Response"

C) Letter from J. M. Pilant to D. B. Vassallo dated December 2, 1983, "Alternate Shutdown Capability"

Dear Mr. Vassallo:

Nebraska Public Power District is currently conducting a reevaluation of Cooper Nuclear Station's (CNS) compliance with Appendix R. This reevaluation was initiated in response to the issues raised at the 1984 NRC regional fire protection meetings and the draft of Generic Letter 85-01. NPPD is submitting this progress report to keep the staff advised of our reevaluation effort and to request a meeting with the staff to discuss specific exemptions to schedular requirements.

To date, the District has conducted a detailed analysis of the safe shutdown capabilities in event of a fire. The District has conducted an extensive field walkdown to verify the locations of the safe shutdown cables and conduits at CNS. The results of the walkdowns have been inputted to a computer program to verify that adequate separation exists between the redundant capabilities required to safely shut down the plant. The analysis is scheduled to be completed May 15, 1985.

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At this time, the District has identified several areas at CNS which do not meet the strict technical requirements of 10CFR50, Appendix R, using the safe shutdown methodologies identified in the District's submittals of References B) and C). Because of this, the District proposes to use the automatic depressurization system and the core spray system to achieve safe shutdown for certain plant areas. In some cases, this strategy may result in a short-term uncovering of the upper portion of the core during depressurization. This type of methodology has been previously approved in Reference A) which requests licensees to file an exemption request for the use of this approach. Based on this, the District will soon be requesting an exemption from the requirements of 10CFR50, Appendix R, Section III.L.2(b).

The District has also identified some cable separation problems that will require cable wraps and/or rerouting to achieve strict compliance with Appendix R in the remaining areas. The District is making a concerted effort to perform these modifications during the present refueling outage; however, the District does not believe it can achieve all of the proposed changes prior to plant start-up.

Therefore, the District respectfully requests a meeting with the staff during the week of May 27, 1985, to discuss the specific plant areas which may not be in compliance with Appendix R, Section II.G.2, at the time of start-up (approximately July 19, 1985). At this meeting, the District will demonstrate that in all cases the plant can achieve safe shutdown conditions in the event of a fire. In addition, the District will describe the compensatory measures that will be implemented during the brief operating period until the modifications will be complete. Accordingly, the District plans to request, pursuant to 10CFR50.12, a specific exemption from the schedular requirements of 10CFR50.48(c). Specifically, an extension until the 1986 refueling outage (approximately September, 1986) will be requested for select fire protection modifications required by 10CFR50, Appendix R, Section III.G.2.

A major factor contributing to the need to request a schedular exemption has been the amount of work that has been scheduled during the present outage at Cooper Nuclear Station. The District will complete such modifications as recirculation pipe replacement, all equipment qualification requirements (except reactor equipment cooling pump motors), change out of the plant process computer, installation of the SPDS, implementation of the Emergency Operating Procedures, as well as numerous modifications to comply with 10CFR50, Appendix R. Manpower restraints during this ambitious outage have resulted in the inability to complete all of the Appendix R modifications prior to start-up.

In summary, the District has expended considerable effort in an attempt to meet all NRC fire protection requirements within the required schedule. It is the District's opinion that overall plant safety will not be affected adversely by the schedular delay since the current design and compensatory measures will assure safe shutdown in the event of a fire in any 10CFR50, Appendix R, Section III.G.2 areas (i.e., nonalternate shutdown areas).

We look forward to discussions with our NRC Project Manager to establish the staff meeting. If you have any questions or require additional information, please contact me.

Sincerely,

Jay M. Pilant
Technical Staff Manager
Nuclear Power Group

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