Nebraska Public Power District

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NSD921004
September 21, 1992

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

Subject: Response to Supplement 1 to Generic Letter 87-02
Cooper Nuclear Station
Docket No. 50-298, DPR-46

References: 1) Letter to James G. Partlow (NRR-NRC) from Neil P. Smith (SQUG) dated August 21, 1992, "SQUG Response to Generic Letter 87-02, Supplement 1 and Supplemental Safety Evaluation Report No. 2 on the SQUG GIP"

2) Letter (No. NLS8800486) to the NRC Document Control Desk from G. A. Trevors (NPPD) dated October 7, 1988, "Response to Generic SER for Unresolved Safety Issue A-46"

3) Letter (No. NLS9100826) to the NRC Document Control Desk from G. R. Horn dated December 19, 1991, "Response to Generic Letter 88-20, Supplement 4, Individual Plant Examination of External Events - 10CFR50.54(f)"

Gentlemen:

I. INTRODUCTION

On February 19, 1987, the Nuclear Regulator Commission (NRC) issued Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46." This Generic Letter encouraged licensed utilities to participate in a generic program to resolve the seismic verification issues associated with USI A-46. As a result, the Seismic Qualification Utility Group (SQUG) developed the "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment." On May 22, 1992, the NRC Staff issued Generic Letter 87-02, Supplement 1, which constituted the NRC Staff's review of the GIP and which included Supplemental Safety Evaluation Report Number 2 (SSER-2) on the GIP, Revision 2, corrected on February 14, 1992. The letter to SQUG enclosing SSER-2 requests that SQUG member utilities provide to the NRC, within 120 days, a schedule for implementing the GIP. By letter (Reference 1) dated August 21, 1992, to James G. Partlow, NRR-NRC, SQUG clarified that the 120 days would expire on September 21, 1992. This letter responds to the Staff's request.

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II. COMMITMENT TO GIP

GIP Commitments

As a member of SQUG, the Nebraska Public Power District (District) commits to use the SQUG methodology as documented in the GIP, where the "GIP" refers to GIP Revision 2, corrected February 14, 1992, to resolve USI A-46 at the Cooper Nuclear Station (CNS). The GIP, as evaluated by the Staff, permits licensees to deviate from the SQUG commitments embodied in the Commitment sections, provided the Staff is notified of substantial deviations prior to implementation. The District recognizes that the Staff's position in SSER-2 "is that if licensees use other methods that deviate from the criteria and procedures as described in SQUG commitments and in the implementation guidance of the GIP, Rev. 2, without prior NRC staff approval, the method may not be acceptable to the staff and, therefore, may result in a deviation from the provisions of "Generic Letter 87-02".

Specifically, the District hereby commits to the SQUG commitments set forth in the GIP in their entirety, including the clarifications, interpretations, and exceptions identified in the SSER-2 as clarified by the August 21, 1992 SQUG letter (Reference 1) responding to SSER-2.

GIP Guidance

The District generally will be guided by the remaining (non-commitment) sections of the GIP, i.e., GIP implementation guidance, which comprises suggested methods for implementing the applicable commitments. The District will notify the NRC as soon as practicable, but no later than the final USI A-46 Summary Report, of significant or programmatic deviations from the guidance portions of the GIP, if any. Justifications for such deviations, as well as for other, minor deviations, will be retained on site for NRC review.

III. IN-STRUCTURE RESPONSE SPECTRA

For defining seismic demand, the District will use the options provided in the GIP for median-centered and conservative, design in-structure response spectra, as appropriate, depending on the building, the location of equipment in the building, and equipment characteristics.

The licensing basis Safe Shutdown Earthquake in-structure response spectra may be used as one of the options provided in the GIP for resolution of USI A-46. The licensing-basis spectra as described in the Updated Safety Analysis Report, developed consistent with standards and guidance applicable to the plant at the time of licensing, and approved by the NRC in the SER (issued February 14, 1973), may be used and are considered to be conservative design spectra. The procedures and criteria which were used to generate the licensing-basis in-structure response spectra are described in Attachments 1 and 2. Attachment 1 is the earthquake analysis of the Reactor Building prepared by Earth Sciences for CNS on April 17, 1968. Attachment 2 is the earthquake analysis of the Control Building prepared by Earth Sciences on January 23, 1969. In accordance with Section 4.2.3 of the GIP, the effective grade at CNS is considered to be 903' since a controlled, compacted backfill was established during original plant construction.

IV. SCHEDULE

In accordance with the District's previous response to Generic Letter 87-02 (Reference 2) and to Generic Letter 88-20, Supplement 4 (Reference 3), the District intends to integrate and coordinate the A-46 and the Individual Plant Examination for External Events (IPEEE) seismic reviews to the maximum extent possible. The District plans to perform the combined seismic walkdown portion of the IPEEE and A-46 by the conclusion of the first refueling outage scheduled to commence at least 180 days after all A-46 open issues are resolved, including approval of the attached licensing-basis spectra. A Seismic Evaluation Report summarizing the results of the A-46 program at CNS will be submitted to the NRC approximately 180 days following the walkdown completion.

Given the NRC acceptance of this submittal, along with the resolution of all open items by April 1994 (180 days prior to the 1994 refueling outage), the A-46 walkdown will occur during the 1994 refueling outage, currently scheduled to commence in October 1994. The Seismic Evaluation Report will then be submitted by May 22, 1995. This submittal date is in accordance with the three year guidance given in Generic Letter 87-02, Supplement 1. Please note that the A-46 program completion schedule may be affected by coordination with the seismic IPEEE response, the scope and schedule for completing the necessary SQUG training, and by the availability of industry resources which may be unavailable because of the large number of licensees implementing this program. The District will inform the NRC if the completion schedule for the resolution of A-46 cannot be achieved 180 days following the 1994 refueling outage.

Please contact me if you need more information.

Sincerely,

G. R. Horn
Nuclear Power Group Manager

GRH/GRS/drm
Attachments

cc: Regional Administrator
USNRC - Region IV
Arlington, Texas

NRC Resident Inspector
Cooper Nuclear Station

STATE OF NEBRASKA)
)
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 response 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 21st day of September, 1992.

GENERAL NOTARY-State of Nebraska
ALOIS J. HUBL
My Comm. Exp. Aug. 21, 1995

NOTARY PUBLIC

Attachment 1
To NSD921004

EARTHQUAKE ANALYSIS OF THE CONTROL BUILDING
COOPER NUCLEAR STATION