



## Nebraska Public Power District

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G. R. HORN

Senior Vice President, Energy Supply  
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NLS960189

October 10, 1996

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Gentlemen:

Subject: Response to NRC Bulletin 96-03  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

- Reference:
1. NRC Bulletin 96-03 dated May 6, 1996, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors"
  2. Letter BWROG-94034 to A. C. Thadani (USNRC) from L. A. England (BWROG) dated March 24, 1994, "Submittal of BWROG Interim Safety Assessment and Operator Guidance in Response to NRC Bulletin 93-02, Supplement 1"
  3. Letter to USNRC from G. R. Horn (NPPD) dated June 10, 1993, "Response to NRC Bulletin 93-02"
  4. Letter to USNRC from G. R. Horn (NPPD) dated April 18, 1994, "Response to NRC Bulletin 93-02, Supplement 1, Debris Plugging of Emergency Core Cooling Suction Strainers"
  5. Letter to USNRC from G. R. Horn (NPPD) dated November 16, 1995, "Response to NRC Bulletin 95-02 - Unexpected Clogging of RHR Suction Strainers"

This submittal provides the Nebraska Public Power District's (District's) 180 day response to NRC Bulletin 96-03 (Reference 1). The District intends to comply with the requirements of said bulletin through the installation of a large capacity passive strainer design. The District is planning to implement this modification by the end of the first refueling outage starting after January 1, 1997 (RE17, currently scheduled for March 1997) provided generic design considerations are finalized to support our milestone schedule established for implementation during RE17. Delays in final design approval, material procurement, or strainer fabrication and delivery beyond the scheduled milestone dates would cause the District to defer installation until RE18 (currently scheduled for September 1998). Due to the nature of the design, no changes to the Technical Specifications will be required.

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#### Reason for Implementation Date Deferral

The District is vigorously pursuing installation during RE17 as demonstrated in the attached milestone schedule. However, due to uncertainties associated with the final issuance of the Utility Resolution Guidance (URG) document, the District is concerned about the technical and financial risks associated with a firm commitment to complete this installation during RE17.

The District's design will be based on calculational methodologies developed by the BWR Owners' Group (BWROG) ECCS Suction Strainer Committee as documented in the URG. This document has been provided to the Staff in draft form, resulting in numerous comments, and has yet to be formally submitted. Because the resolution of these comments has the potential to affect design assumptions, the District is reluctant to finalize the design and initiate strainer fabrication until the URG review process is completed. Therefore, delays introduced as a result of comment resolution and URG final issuance after December 16, 1996 (i.e., the milestone date for design finalization), would have a direct impact to the current RE17 window.

Accordingly, the District will implement the strainer modification during RE17 provided the final issuance of the URG is on or before December 16, 1996, and the final assumptions do not vary significantly from the assumptions used in our conceptional design. Final issuance of the URG following this date will result in the District deferring installation until RE18.

#### Safety Implications and Mitigative Strategies for Deferred Implementation

The safety implications for the current strainer configuration have been addressed under General Electric Safety Assessment GE-NE-A0005845-01, "BWR Emergency Core Cooling System Suction Strainers," previously transmitted to the NRC under Reference 2.

Assuming the strainer modification is deferred to RE18, the following mitigative actions in addition to those taken in response to NRC Bulletin 93-02 (including Supplement 1) and NRC Bulletin 95-02 (as documented in References 3, 4, and 5) will be taken:

1. The suppression pool will be cleaned during RE17. This cleaning will provide an accurate basis on which to determine the rate of sludge generation and will demonstrate the effectiveness of foreign material exclusion and housekeeping practices.
2. The volume of fibrous and calcium silicate type insulation in the drywell susceptible to transport following a loss-of-coolant accident will be further reduced during RE17. This will be accomplished through the use of reflective metallic insulation. Targeted areas include approximately 144 feet of instrumentation piping, approximately 57 feet of Standby Liquid Control system piping, chilled water supply and return piping, head vent piping, and isolated sections of Reactor Water Clean-Up system piping.

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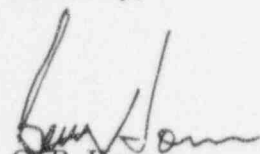
October 10, 1996

Page 3 of 4

These actions (both those taken in response to previous bulletins and those committed above) provide adequate assurance of suction strainer operability should the installation be deferred to RE18.

Should you have any questions concerning this matter, please contact me.

Sincerely,



G. R. Horn  
Senior Vice President, Energy Supply

/crm

Attachment

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

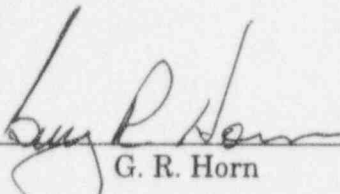
Senior Resident Inspector  
USNRC

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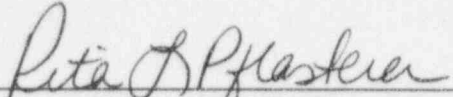
NLS960189  
October 10, 1996  
Page 4 of 4


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 correspondence 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 10<sup>th</sup> day of October, 1996.

  
\_\_\_\_\_  
NOTARY PUBLIC

 GENERAL NOTARY-State of Nebraska  
RITA L. PFLASTERER  
My Comm. Exp. Dec. 19, 1999

MILESTONE SCHEDULE FOR INSTALLATION DURING RE17

Date	Milestone
September 12, 1996	Contract awarded for conceptual design document.
October 8, 1996	Conceptual design document received by the District.
November 14, 1996	Contract to be awarded for strainer design, fabrication, and installation.
December 16, 1996	Draft design to be submitted to the District and fabrication to begin upon District's approval.
January 6, 1997	Detailed design to be submitted to the District for approval.
January 15, 1997	Design modification package to be submitted for the District's review.
February 17, 1997	District's review of the modification package is to be completed.
March 17, 1997	Strainer to be at Cooper Nuclear Station for receipt inspection.
March 28, 1997	Refueling outage to begin.

Correspondence No: NLS960189

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
The District will implement the strainer modification during RE17 provided the final issuance of the URG is on or before December 16, 1996, and the final assumptions do not vary significantly from the assumptions used in our conceptional design.	RE17
If the URG is finalized following December 16, 1996, implement the strainer modification by the end of the second refueling outage starting after January 1, 1997.	RE18
If the strainer modification is deferred to RE18, perform a suppression pool cleaning during the next refueling outage.	RE17
If the strainer modification is deferred to RE18, further reduce the volume of fibrous and calcium silicate type insulation in the drywell susceptible to transport following a loss-of-coolant accident.	RE17