



## Nebraska Public Power District

GENERAL OFFICE  
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499  
TELEPHONE (402) 564-8561

NLS8500162

July 8, 1985

Hugh L. Thomson Jr., Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Thomson:

Subject: Response to Generic Letter 85-07 "Implementation of Integrated Schedules for Plant Modifications"

In response to your subject letter of May 2, 1985, the District provides the attached questionnaire and comment sheet expressing our views on an informal integrated living schedule. Although we have met with the staff on a previous occasion to discuss this issue, we would be most willing to discuss our views further with the staff if desired.

Sincerely,

J. M. Pilant  
Manager, Technical Staff  
Nuclear Power Group

rg  
Attachment

JDW/rg

cc: NRC Distribution

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ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: Cooper Nuclear Station

UTILITY: Nebraska Public Power District

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS \_\_\_\_\_
- B. Have reservations that must be resolved before developing ILS \_\_\_\_\_
- C. Do not presently intend to negotiate an ILS with the staff \_\_\_\_\_
- D. Plan to implement an informal ILS only X (see attached sheet)

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One:        Yes                      No

If yes, select best description:

Engineering judgement \_\_\_\_\_  
Analytic Hierarchy process \_\_\_\_\_  
Risk based analysis \_\_\_\_\_  
Cost-benefit analysis \_\_\_\_\_  
Other (please describe) \_\_\_\_\_

If no, provide estimated date for selecting a methodology: \_\_\_\_\_  
Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: \_\_\_\_\_

2. What is your estimated date for making a submittal to the NRC- \_\_\_\_\_

or

If not presently available, planned date for scheduling a submittal to the NRC \_\_\_\_\_

Nebraska Public Power District Response to Generic Letter 85-07  
Discussion of Informal Inegrated Living Schedule

Nebraska Public Power District is presently using an informal Inegrated Living Schedule (ILS). The ILS uses engineering judgement for prioritizing work at CNS. An analytic hiearchy process to inhance prioritization is being considered. The District previously met with the NRC staff on May 12, 1982, to discuss the ILS concept, and the development of a "contract" with the staff in this regard. (Reference letter from D. G. Eisenhut to J. M. Pilant dated April 12, 1982). Division of Licensing staff attendees were Mssrs. Domonic Vassallo, Gary Meyer, Robert Purple, and Byron Siegel. Details of the District's reservations with a formal License condition were discussed at length during that meeting.

In the Districts 11-year operating experience with CNS, we believe we have developed a working relationship with the Division of Licensing and NRC Region IV such that there presently is well founded integration of all implementation efforts. We presently utilize a cooperative effort to schedule completion dates for NRC required plant modifications, and CNS has always been rated SALP Category I as regards Licensing activities. We do not believe a formal License condition is necessary to confirm an agreement showing good faith. NRC activities have always been scheduled and completed at CNS consistant with optimum utilization of resources. All District sponsored plant betterment projects have had an opportunity to be scheduled and completed. Confirmitory orders issued to the District have not proven to be an undue hardship.