

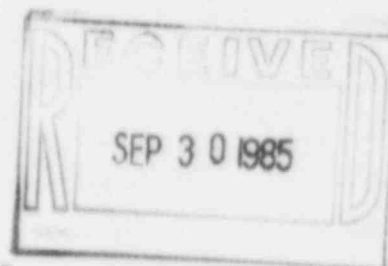
# Nebraska Public Power District

GENERAL OFFICE  
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TELEPHONE (402) 564-8561

NLS8500252

September 26, 1985

Mr. E. H. Johnson, Chief  
Reactor Projects Branch I  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011



- Reference:
- 1) Letter from J. M. Pilant to D. B. Vassallo dated May 9, 1985  
"Appendix R Analysis of Cooper Nuclear Station"
  - 2) Letter from J. M. Pilant to D. B. Vassallo dated June 7, 1985, "Appendix R - Scheduler Exemption; request for"
  - 3) Letter from J. M. Pilant to D. B. Vassallo dated July 18, 1985, "Withdrawal of certain Appendix R Exemption Requests"
  - 4) Letter from J. M. Pilant to D. B. Vassallo dated July 31, 1985, "Withdrawal of certain Appendix R Exemption Requests"
  - 5) Letter from H. L. Thompson to J. M. Pilant dated August 21, 1985, "Outstanding Fire Protection Modifications"

Dear Mr. Johnson:

In Reference 1, the District discussed that as a result of detailed analyses, extensive field walkdowns, and computer program verifications which were recently completed, a meeting with the NRC staff was desired to discuss specific exemptions to the scheduler requirements of 10CFR50.48. The District subsequently submitted details of the six (6) scheduler exemption requests in Reference 2. Due to modifications and analyses, the need for exemption requests two (2) and six (6) were negated, and the exemption requests were withdrawn by References 3 and 4. Reference 5 contained the staff's Safety Evaluation of our proposed modifications and found them acceptable. Reference 5 also stated that "Because your 50.48(c) schedule has expired for several years, we cannot now grant an exemption extending that schedule. Your schedule for completion of modifications as well as the interim compensatory measures that will be instituted should be addressed by Region IV". This letter is written to address with the Region the modification schedule and interim compensatory measures.

The modifications discussed in Exemptions 1, 3, 4, and 5 of Reference 2 remain to be completed at Cooper Nuclear Station; however, the compensatory measures discussed in Reference 2, and recognized by the staff in reference 5, have been implemented prior to startup from the recent outage. Because the majority of these modifications require plant shutdown in order to safely modify safety systems, they are scheduled to be completed during the 1986 refueling outage (approximately October 1986).

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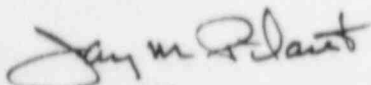
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In order to clarify information previously submitted, the District wishes to offer the following details. Exemption 5 of Reference 2 discussed replacing fire doors and the requirement for a three (3) hour rated barrier. The SER of Reference 5 stated that the "Fire doors in the following locations must either be verified as having a 3-hour rating, or new fire doors must be purchased". The District is aware that a staff position on fire doors applying to our fire loading situation allows for a rating of less than three (3) hours. Accordingly, the District will be installing doors of a lesser rating in some locations. Additionally, References 2 and 5 discussed installing circuit isolation switches for HPCI interlock cables. The District is presently analyzing whether this modification would be an unreviewed safety question and whether an alternative solution such as permanent procedural control would be preferable. The staff will be advised of the results of our analysis.

If you require additional detail or clarification, please contact my office.

Sincerely,



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

JDW/rg