

NLS2000043 April 5, 2000

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

Gentlemen:

Subject:

Design Basis Accident Radiological Assessment Calculational

Methodology - Supplemental Information

Cooper Nuclear Station, NRC Docket No. 50-298, DPR-46

References:

- 1. Letter to U.S. Nuclear Regulatory Commission (NLS990122) from John H. Swailes (Nebraska Public Power District) dated December 22, 1999, Design Basis Accident Radiological Assessment Calculational Methodology Revision.
- Letter to U.S. Nuclear Regulatory Commission (NLS2000033) from John H. Swailes (Nebraska Public Power District) dated March 24, 2000, Design Basis Accident Radiological Assessment Calculational Methodology - Supplemental Information.

By letter dated December 22, 1999 (Reference 1), the Nebraska Public Power District (District) submitted revised design basis accident radiological assessment calculational methodology for Nuclear Regulatory Commission (NRC) review and approval. Reference 2 was submitted in support of the NRC's review of the Reference 1 submittal. Based on verbal discussion with the NRC Staff on April 5, 2000, a revision to the information provided in Reference 2 was requested as a point of clarification.

The following paragraph contains the revised information and is provided as a replacement paragraph for Reference 2, Page 2, last paragraph. Specifically, the phrases "the Control Room operator," "the control room operator," or "Control Room operator" were replaced with the phrase "Control Room personnel."

Based on teleconferences with the NRC Staff, the District is aware that the NRC Staff review of the use of ARCON96 for elevated releases and for building vent path releases will not be completed prior to the Cooper Nuclear Station Cycle 20 startup. As such, the NRC review of Control Room personnel post-accident integrated doses associated with these calculations will not be complete prior to the anticipated restart date. While the District believes that the assumptions used in its dose calculations (which demonstrate

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that the GDC 19 limits are met for Control Room personnel integrated dose) are reasonable, the District will continue implementation of the previous commitment to make KI (potassium-iodide) tablets available to Control Room personnel (in accordance with the recommended dosage) if plant conditions indicate that a LOCA is occurring coincident with core damage. Continuing this interim compensatory measure will provide reasonable assurance that GDC 19 limits are met for both the District's and the NRC Staff's evaluation and will remain in effect until the NRC's concerns are resolved.

This revision does not reflect either a change in scope or intent regarding the District's original submittal (Reference 1). Accordingly, the significant hazards determination submitted previously (Reference 1) also remains unchanged and the previous Federal Register notice regarding these matters continues to be valid.

Should you have any questions concerning this matter, please contact me at (402) 825-5236.

Sincerely,

Sharon R. Mahler

Assistant Manager Nuclear Licensing and Safety

/rlb

cc: Regional Administrator USNRC - Region IV

Shan R. Man

Senior Project Manager
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**NPG** Distribution

## ATTACHMENT 3 LIST OF NRC COMMITMENTS

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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 NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

	COMMITTED DATE
COMMITMENT*	OR OUTAGE
The District will continue the previous commitment to make KI (potassium-iodide) tablets available to Control Room personnel (in accordance with the recommended dosage) if plant conditions indicate that a LOCA is occurring coincident with core damage.	N/A
*Commitment supersedes similar commitment made in NLS2000033 due to change in phrase "Control Room operators" to "Control Room personnel". There is no reduction in commitment as this change is an administrative clarification only.	

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