



**Nebraska Public Power District**  
*Nebraska's Energy Leader*

NLS2001020  
March 6, 2001

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

Gentlemen:

Subject: Implementation of Revised 10 CFR 50.59  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

The effective date for the revised 10 CFR 50.59, was established in a December 13, 2000, Federal Register notice (65 FR 77773), as March 13, 2001. As discussed in Regulatory Issue Summary (RIS) 2001-03, dated January 23, 2001, the Nuclear Regulatory Commission (NRC) has stated that to permit an orderly transition to the revised rule, licensees may implement the rule later than the Federal Register date. Based on this allowance, the Nebraska Public Power District (District) plans on implementing the revised requirements of 10 CFR 50.59 by July 2, 2001.

Implementation is defined as the date the District is following the new 10 CFR 50.59 requirements and associated plant procedures for 10 CFR 50.59 reviews and analyses. Reviews performed pursuant to 10 CFR 50.59 which begin prior to July 2, 2001, will continue to be implemented under the old rule even if completed after the new rule is in place. Similarly, any 10 CFR 50.59 review begun and completed prior to July 2, 2001 will be performed under the old 10 CFR 50.59 rule.

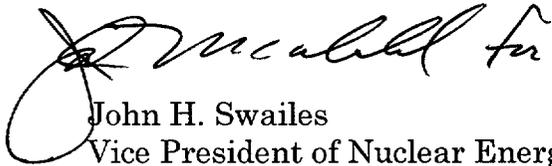
The reason for delay in implementation of the new rule primarily involves the fact that the District is currently implementing a new Enterprise Business Solution software company-wide, as part of a corporate strategy to restructure and redesign core business processes. This initiative requires extensive training of plant personnel and complete revisions of many plant procedures during the first quarter of 2001. This phase of the initiative is scheduled to be completed shortly after the effective date of the new 10 CFR 50.59 rule. Additionally, the plant will be in a mid-cycle outage shortly before the effective date. Recognizing the demands already placed on plant resources, the District does not believe it would be wise to concurrently attempt during the same time frame, the transition to the new rule. The requested implementation delay will better ensure that procedures have been appropriately revised and that sufficient personnel have been trained in the new process before its use.

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Should you have any questions concerning this matter, please contact Michael Boyce at (402) 825-5100.

Sincerely,

A handwritten signature in black ink, appearing to read "John H. Swailes". The signature is written in a cursive style with a large, looping initial "J".

John H. Swailes  
Vice President of Nuclear Energy

/lrd

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

E. McKenna  
USNRC - NRR/RGEB

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