



Nebraska Public Power District
Nebraska's Energy Leader

NLS2002085
July 29, 2002

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

Subject: Safety Evaluation For Appendix R to 10 CFR Part 50, Items II.G.3 and III.L, Alternate or Dedicated Shutdown Capability Clarification

- References:**
1. NRC Letter, "Safety Evaluation for Appendix R to 10 CFR Part 50, Items II.G.3 and III.L, Alternate or Dedicated Shutdown Capability," from Domenic B. Vassallo to J. M. Pilant (NPPD) dated April 16, 1984.
 2. NPPD Letter LQA8300256, "Response to 10CFR50, Appendix R, 'Fire Protection of Safe Shutdown Capability – Volume III,'" from J.M. Pilant (NPPD) to D.B. Vassallo dated December 2, 1983.

The Nuclear Regulatory Commission (NRC) issued to Nebraska Public Power District (NPPD) its review of the Cooper Nuclear Station (CNS) Response to 10CFR50, Appendix R, "Fire Protection of Safe Shutdown Capability – Volume III," in Reference 1. The accompanying safety evaluation (SE) concluded that CNS meets the requirements of Appendix R, Section III.G.3 and III.L and stated that the NRC considered the issue resolved for our facility. NPPD agrees with the overall conclusion. However, during a recent review of plant procedures, differences were identified between the content of some post-fire procedures and two statements in the SE enclosed with Reference 1. Further review identified differences between statements in the submittal, Reference 2, and the SE. The differences dealt with whether repairs are necessary to achieve cold shutdown in two possible fire scenarios. Finding these differences identified the need for certain clarifications that are appropriate to make with respect to post-fire shutdown capability of CNS.

Clarifications

The introduction to the SE states, "No repairs or modifications are required to effect hot or cold shutdown utilizing the alternate shutdown methods." Later in a section entitled "Repairs/72 Hour Requirement" the SE states, "The alternate shutdown methods have the capability of achieving cold shutdown within 72 hours after a fire event with no repairs." As a clarification to these statements it should be noted that NPPD identified, in Reference 2 on page 4-19, two fire scenarios in which repairs might be needed in order to achieve and maintain cold shutdown. These two events being first, a single fire event

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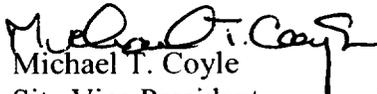
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could possibly damage the power supply cables to both diesel generator fuel oil transfer pumps, and second, a single fire event could possibly damage the power supply cables to both station battery chargers. In either of these cases repairs would be needed in order to achieve and maintain cold shutdown. The specific reference on page 4-19 is "If both fuel oil transfer pumps have been damaged, then a repair procedure will be initiated to regain their operation and replenish the day tanks. ...The redundant power cables to both the station battery chargers could be damaged by a severe fire in the vicinity of the Auxiliary Relay Room. To compensate for the loss of charging capability to both of the 125V dc batteries and/or both the 250V dc batteries a post-fire repair capability will be established." Repairs are allowed by 10 CFR 50 Appendix R Section III.L.5 to achieve and maintain cold shutdown.

The above clarification is offered as such and does not impact the NRC's conclusion that Cooper Nuclear Station meets the requirements of Appendix R, Section III.G.3 and III.L.

Should you have any questions concerning this matter, please contact Paul Fleming at (402) 825-2774.

Sincerely,


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/cb

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