

## Nebraska Public Power District

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NLS2003032 May 15, 2003

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

Subject: Clarification of License Amendment 196 Safety Evaluation Information Cooper Nuclear Station, NRC Docket No. 50-298, DPR-46

- References: 1. Letter to Clay C. Warren (Nebraska Public Power District) from U.S. Nuclear Regulatory Commission dated February 21, 2003, "Cooper Nuclear Station – Issuance of Amendment Regarding Design Basis Accidents' Radiological Dose Assessment Methodologies, and Revision to License Condition 2.C.(6) (TAC No. MB4654)."
  - Letter to U.S. Nuclear Regulatory Commission from David L. Wilson (Nebraska Public Power District) dated February 26, 2002, "License Condition 2.C.(6) Seismic Evaluation" (NLS2002014).
  - 3. Letter to U.S. Nuclear Regulatory Commission from Michael T. Coyle (Nebraska Public Power District) dated June 9, 2002, "Supplemental Information Related to License Condition 2.C.(6) Seismic Evaluation" (NLS2002073).
  - Letter to U.S. Nuclear Regulatory Commission from David L. Wilson (Nebraska Public Power District) dated September 27, 2002, "Response to Request for Additional Information Related to Nebraska Public Power District's Seismic Reevaluation Proposed to Address Cooper Nuclear Station License Condition 2.C.(6)" (NLS2002120).

The purpose of this letter is to clarify information contained in the Safety Evaluation to Reference 1 regarding the seismic ruggedness of the Main Steam Isolation Valve (MSIV) leakage pathway. Section 3.2.1.4 of the Safety Evaluation indicates that 2.0 x Safe Shutdown Earthquake (SSE) Ground Response Spectra is used as the seismic demand for all elevations in the Reactor Building up to and including 932'-6". This information was provided to the Nuclear Regulatory Commission (NRC) in Section 4.4.4 to Enclosure 1 of Reference 2, and was based on maintaining uniformity with the proposed seismic demand of the Turbine Building. In Reference 3, the Nebraska Public Power District (NPPD) described a new Turbine Building seismic response spectra that would supersede the criteria provided in Reference 2. As part of developing the revised Floor Response Spectra (FRS) for the Turbine Building it was necessary

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to apply the same methodology to develop a compatible Reactor Building FRS for the piping that transects the two buildings. In Reference 4, the design inputs and methodology for the revised Turbine Building FRS were provided as an Appendix. While certain information was provided in that Appendix regarding the revised Reactor Building FRS, NPPD would like to ensure that the NRC staff fully understands key details regarding this course of action.

The new Reactor Building FRS was applied exclusively for evaluating the seismic ruggedness of the post-Loss of Coolant Accident MSIV leakage pathway. This FRS was generated in a consistent manner to the Turbine Building FRS, discussed in Section 3.2.1.3 of Reference 1. Specifically, this FRS uses the soil-structure interaction analysis method and Regulatory Guide 1.60 ground response spectrum anchored to the Cooper Nuclear Station (CNS) SSE peak ground acceleration of 0.2g, and has been developed in accordance with the guidance in NUREG-0800 (NRC Standard Review Plan), Sections 3.7.1 and 3.7.2. As described in Reference 4, Attachment 1 Appendix, Sheet 15 of 89, the revised Reactor Building FRS are calculated only for Floor Elevations 903'-6" and 931'-6". The Reactor Building FRS will be incorporated into the CNS design and licensing bases under the provisions of 10CFR50.59 prior to restart from Refueling Outage 22, consistent with the requirements of License Condition 2.C.(6). Accordingly, NPPD concludes that specific NRC review and approval of the FRS will not be required.

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

Sincerely,

Michael T. Covle

Site Vice President

/wrv

cc: Regional Administrator USNRC - Region IV

> Senior Project Manager USNRC - NRR Project Directorate IV-1

Senior Resident Inspector USNRC

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STATE OF NEBRASKA ) ) NEMAHA COUNTY )

Michael T. Coyle, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this correspondence on behalf of the Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.

Michael T. Covle

Subscribed in my presence and sworn to before me this  $\frac{15}{15}$  day of May, 2003.

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ATTACHMENT 3 LIST OF NRC COMMITMENTS

## Correspondence No: NLS2003032

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The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. 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.

COMMITMENT	COMMITTED DATE OR OUTAGE
The Reactor Building FRS will be incorporated into the CNS design and licensing basis under the provisions of 10CFR50.59.	Prior to restart from RFO-22
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