



Nebraska Public Power District

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NLS2004019
March 8, 2004

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

- Subject:** Response to Request for Additional Information Regarding Proposed License Amendment Request for Loss-of-Coolant Accident (LOCA) Dose Calculation Methodology and Resolution of Remaining License Condition 2.C.(6) Issues Cooper Nuclear Station, NRC Docket No. 50-298, DPR-46
- Reference:**
1. Letter to R. Edington (Nebraska Public Power District) from U.S. Nuclear Regulatory Commission dated February 5, 2004, "Request for Additional Information Regarding Proposed License Amendment Request for Loss-of-Coolant Accident (LOCA) Dose Calculation Methodology and Resolution of Remaining License Condition 2.C.(6) Issues (TAC No. MC1572)."
 2. Letter to U. S. Nuclear Regulatory Commission from R. Edington (Nebraska Public Power District) dated December 9, 2003, "License Amendment Request for LOCA Dose Calculation Methodology and Resolution of Remaining License Condition 2.C.(6) Issues" (NLS2003105).

The purpose of this letter is to respond to the Request for Additional Information provided in Reference 1 regarding the previously submitted License Amendment Request of Reference 2. These responses summarize information provided during a teleconference held on January 12, 2004 between Nebraska Public Power District (NPPD) personnel and members of the Nuclear Regulatory Commission staff.

Question 1 - Regarding the installation of the new boundary valves, what sort of considerations were made in the sizing calculations for the handwheel actuators? The specific concern is that the Operator will be able to close the valves without assistance under the process conditions that will exist.

Response - The new boundary valves are in the open position during normal plant operation. They are standard ANSI rated valves with standard operators to meet normal and design operating conditions.

During the design basis accident, the valves would be manually positioned to establish the post-LOCA Main Steam Isolation Valve (MSIV) leakage pathway boundary. Because the valves are located downstream of the MSIVs and the MSIVs are closed, the only flow downstream is the very low leakage flow past the MSIVs. Additionally, since the MSIV

leakage pathway to the Main Condenser will be open with condenser vacuum lost, the piping downstream of the MSIVs will be depressurized. Accordingly, operators will manipulate these valves at nearly zero differential pressure. Once positioned, the valves will not be re-positioned. Thus, there is no concern of thermal or pressure binding preventing subsequent valve operation. Moreover, each of the valves was manually operated after installation to assure they could be opened and closed.

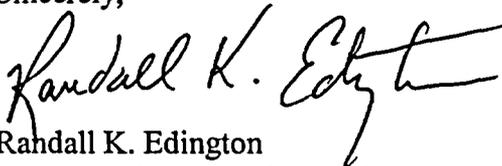
Question 2 - *Regarding the decision not to include the manual valves in the IST Program, how will the functional testing be performed, and how will the testing monitor/address degrading performance?*

Response - The Updated Safety Analysis Report will be revised to specify cycling of the manually operated valves¹ once per cycle during an outage. The evolution will be controlled via a Station Surveillance Procedure, and the scheduling and tracking of performance will be controlled under the station's surveillance program.

NPPD believes that inclusion of these valves in the Augmented Inservice Testing (IST) Program is not necessary and would add minimal value for the level of effort to include them in the program. Other than exercising the valves, there is no IST-related testing that can be applied to trend degradation of manual, non-powered valves. Thus, cycling the valve to assure functionality under the surveillance program is an appropriate alternative to detect potential degradation of the valve's function to be manually repositioned. Deficiencies noted during the surveillance would be entered into the corrective maintenance process, or Corrective Action Program, as required.

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

Sincerely,



Randall K. Edington
Vice President - Nuclear and
Chief Nuclear Officer

/wrv

1. The MSIV Leakage Pathway boundary consists of 13 valves that are manually closed, 3 power-operated valves that automatically close, and 2 remotely controlled air-operated valves that fail to the closed position during a design basis LOCA. The principal pathway is opened to the Main Condenser during a design basis LOCA by manually opening 3 motor-operated valves via the handwheel.

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