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NLS2004077
June 17, 2004

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

Subject: Response to Request for Additional Information Regarding License Amendment Request for a One-Time Extension of Certain Surveillance Requirements
Cooper Nuclear Station, Docket 50-298, License No. DPR-46

References:

1. U.S. Nuclear Regulatory Commission letter to Nebraska Public Power District dated May 27, 2004, "Cooper Nuclear Station – Request for Additional Information (RAI) Regarding License Amendment Request for a One-Time Extension of Certain Surveillance Requirements (SRs) (TAC NO. MC1914)"

2. Nebraska Public Power District letter to the U.S. Nuclear Regulatory Commission dated January 30, 2004, "License Amendment Request – One Time Extension of Surveillance Requirements" (NLS2004007)

The purpose of this letter is to respond to the U.S. Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI) transmitted to Nebraska Public Power District (NPPD) in Reference 1. The RAI is based on the NRC review of the license amendment request for the Cooper Nuclear Station (CNS) submitted in Reference 2.

As discussed in Reference 1, the RAI concerns the request for extension of Surveillance Requirement (SR) 3.3.8.1.2, Channel Calibration for Loss of Power Instrumentation Functions, on pages 15 and 16 of Attachment 1 from Reference 2. The RAI requested that NPPD indicate the methodology used to extend the Allowable Value from the 18-month interval to a 24-month interval.

Using the instrument drift data obtained from performances of SR 3.3.8.1.2 on approximately 18-month cycles, NPPD determined the amount of drift that could be expected over a period of 24 months. The amount of drift expected over the projected 24-month period was determined assuming that the drift would increase linearly with time. The use of linear extrapolation is acceptable because the anticipated relay drift, determined using the General

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Electric (GE) Setpoint Methodology, increases at a rate slightly less than linear. The GE Setpoint Methodology used is that reflected in NEDC-31336, September 1996, as approved by NRC in letter from Bruce A. Boger to Robert. A. Pinelli dated November 6, 1995. The GE Setpoint Methodology uses the vendor accuracy of the relays and then calculates the drift based on the frequency of the testing. Using the GE Setpoint Methodology, as the length of time between calibrations increases, the amount of setpoint drift increases at a rate slightly less than linear. Therefore, the use of a linear extrapolation for these relays is conservative.

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

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/17/2004
(Date)

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

/rer

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
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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 for information only and are not regulatory commitments. Please notify the Licensing & Regulatory Affairs Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
None	