

August 13, 2004

Mr. Randall K. Edington
Vice President-Nuclear and CNO
Nebraska Public Power District
P. O. Box 98
Brownville, NE 68321

SUBJECT: COOPER NUCLEAR STATION - REQUEST FOR ADDITIONAL INFORMATION
RE: CONTAINMENT ISOLATION LOGIC CHANGE FOR REACTOR VESSEL
WATER LEVEL (TAC NO. MC3320)

Dear Mr. Edington:

By letter dated May 27, 2004, Nebraska Public Power District (the licensee) requested the Nuclear Regulatory Commission (NRC) staff approve an amendment to revise the CNS Technical Specifications. The proposed amendment would lower the reactor vessel water level at which the reactor water cleanup system isolates, secondary containment isolates, and the control room emergency filter system starts, as recommended in General Electric Service Information Letter No. 131.

The NRC staff has reviewed the information provided in the submittal and determined that additional information is required in order to complete the review of the changes. As agreed upon in telephone call on August 11, 2004, with Ed McCutchen, the licensee will respond to the request for additional information (RAI) within 45 days. The RAI is enclosed.

Sincerely,

/RA/

Michelle C. Honcharik, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosure: RAI

cc w/encl: See next page

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Shanlai Lu

Steve LaVie

ACCESSION NO: ML 042260374

*See Tad Marsh 7/1/04 deferral memo

**RAI input via e-mail dated

OFFICE	PDIV-1/PM	PDIV-1/LA*	SRXB-A/SC**	EEIB-A/SC**	PDIV-1/SC
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DATE	8/12/04	N/A	7/19/04	7/20/04	8/12/04

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REQUEST FOR ADDITIONAL INFORMATION
ISSUES RELATED CONTAINMENT ISOLATION LOGIC CHANGE
FOR REACTOR VESSEL WATER LEVEL
COOPER NUCLEAR STATION
DOCKET NO. 50-298

1. Discuss the instrument setpoint methodology used to calculate the reactor vessel water level allowable values.
2. The licensee stated in the May 27, 2004, submittal that reactor vessel water level is one of the input parameters to the isolation logic. The NRC staff is concerned that the proposed change from Level 3 to Level 2 would delay the protective action of the primary containment isolation, the secondary containment isolation, and the control room emergency filter system initiation. Verify that these changes will not affect the safety analyses assumptions with respect to the response time requirements by the protective actions.
3. In the General Electric Service Information Letter No. 131, Containment Isolation Logic Change, dated March 31, 1975, it was recommended to add an reactor water clean up (RWCU) break detection system for automatic isolation on a cleanup system line break if the RWCU system isolation logic is changed to initiate at reactor vessel water Level 2. The purpose of the detection system is to meet the criteria for minimizing the radiological consequences of a pipe break outside the primary containment. In order to meet this requirement, The licensee stated in its submittal that CNS has a functional RWCU leak/break detection system. The system provides for automatic isolation upon detection of either high flow in the RWCU system or high temperature in the vicinity of high temperature RWCU piping. The high RWCU flow signals are initiated from differential pressure (DP) switches that are connected to an elbow flow tap on the inlet pump suction line of the RWCU System. Explain the system response to a RWCU line break located between the RWCU outbound isolation valve and the elbow flow tap. Also, please indicate the number of temperature elements in the area (i.e. in the RWCU heat exchanger room) and explain the logic that would initiate the protective response.
4. For a spectrum of breaks inside containment, will the set point switch from Level 3 to Level 2 cause the delay to the secondary containment isolation? If it does, what is the impact on the dose calculation?
5. Has the existing RWCU break detection system been graded as a safety system so that rigorous equipment qualification program is used to maintain the system?

ENCLOSURE

Cooper Nuclear Station

cc:

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