

August 27, 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: ONE TIME EXTENSION OF DIESEL GENERATOR ALLOWED OUTAGE
TIME (TAC NO. MC3770)

Dear Mr. Edington:

Nebraska Public Power District (the licensee) requested the Nuclear Regulatory Commission (NRC) staff approve one time extension of diesel generator allowed outage time.

The NRC staff has reviewed the information provided in the July 15, 2004, submittal and determined that additional information is required in order to complete the review of the changes. As agreed upon with Ed McCutchen on August 24, 2004, the licensee will respond to the request for additional information (RAI) within 30 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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ACCESSION NO: ML042400161

*See Tad Marsh Deferral Memo
**No substantive changes

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OFFICIAL RECORD COPY

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Cooper Nuclear Station

-2-

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Brownville, NE 68321

REQUEST FOR ADDITIONAL INFORMATION

ISSUES RELATED TO ONE TIME EXTENSION OF DIESEL GENERATOR

ALLOWED OUTAGE TIME

COOPER NUCLEAR STATION

DOCKET NO. 50-298

1. Discuss and provide information on the reliability of the transfer scheme from normal station service transformer (NSST) to startup station service transformer (SSST) relating to the proposed change. The discussion should include transfer time, cause, date and time of each transfer and any failures in the scheme to transfer successfully. In case of failure of the transfer from the NSST to SSST, how long does it take to transfer the 4.16 kV safety buses to emergency station service transformer (ESST). Discuss whether the transfer from SSST to ESST is automatic or manual.
2. It is NRC staff's understanding that the purpose of the requested amendment is to allow an increased outage time during plant power operation for corrective maintenance to the fuel oil storage tanks and transfer system. Provide information on tests to be performed after the corrective maintenance to the fuel oil storage tanks and transfer system is completed in order to declare the diesel generator (DG) operable. Provide justification for performing those tests at power.
3. What type of communication has been established between the control room operator at Cooper Nuclear Station and the System Load Dispatcher? Is the System Load Dispatcher notified in advance that the DG is going to be out for extended period of time?
4. Other licensees who requested for DG allowed outage time (AOT) extension provided the following Regulatory Commitments in their requests:
 - A. Weather conditions will be evaluated prior to entering the extended DG AOT for voluntary planned maintenance. An extended DG AOT will not be entered for voluntary planned maintenance purposes if official weather forecasts are predicting severe conditions (tornado or thunderstorm warnings).
 - B. The condition of the offsite power supply and switchyard will be evaluated prior to entering the extended AOT.
 - C.. No discretionary switchyard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary or startup transformers associated with the unit.

ENCLOSURE

- D . No maintenance or testing that affects the reliability of the train associated with the OPERABLE DG will be scheduled during the extended AOT. If any testing and maintenance activities must be performed while the extended AOT is in effect, an evaluation will be performed in accordance with Section 50.65(a)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR).
- E. The steam driven emergency feedwater pump will not be taken out of service for planned maintenance activities and will be treated as protected equipment.
- F. The system dispatcher will be contacted once per day and informed of the DG status along with the power needs of the facility.
- G. The on-shift Operations crews will discuss and review appropriate normal and emergency operating procedures upon or prior to assuming the Watch for the first time after having scheduled days off while the AOT is in effect.
- H. The Operations crews will be briefed concerning the unit activities, including compensatory measures established following instruction of the Shift Manager upon the loss of power event. This briefing will be performed upon or prior to assuming the Watch for the first time after having scheduled days off while the AOT is in effect.

Please provide the provisions, limitations and compensatory actions with respect to the above that NPPD will be committing to implement to assure adequate defense in depth, during the extended DG AOT.

- 6. Discuss regulatory commitments to implement other restrictions and compensatory measures during the extended AOT that would ensure the availability of the remaining sources of power to minimize the occurrence of an station black out and ensure compliance with the requirements of 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 17, "Electric power systems" and GDC 18, "Inspection and testing of electric power systems."
- 7. Discuss whether the temporary tubing from the temporary tank will remain connected to the day tank supply line during the DG AOT. Additionally, discuss how the temporary tubing and its routing will be protected from site traffic and ongoing maintenance and construction activities.