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NLS2004111
September 28, 2004

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

Subject: Response to Request for Additional Information Regarding One Time Extension of Diesel Generator Allowed Outage Time
Cooper Nuclear Station, NRC Docket No. 50-298, DPR-46

References:

1. Letter to R. Edington (Nebraska Public Power District) from U.S. Nuclear Regulatory Commission dated August 16, 2004, "Request for Additional Information Regarding One Time Extension of Diesel Generator Allowed Outage Time (TAC No. MC3770)"

2. Letter to R. Edington (Nebraska Public Power District) from U.S. Nuclear Regulatory Commission dated August 27, 2004, "Request for Additional Information Regarding One Time Extension of Diesel Generator Allowed Outage Time (TAC No. MC3770)"

3. Letter to U.S. Nuclear Regulatory Commission from R. Edington (Nebraska Public Power District) dated July 15, 2004, "License Amendment Request to Extend Diesel Generator Allowed Outage Time and Utilize Temporary Fuel Oil Storage Tanks on a One-Time Basis" (NLS2004076)

The purpose of this letter is for Nebraska Public Power District (NPPD) to respond to the Requests for Additional Information (RAIs) provided in References 1 and 2 by the Nuclear Regulatory Commission (NRC) regarding the previously submitted License Amendment Request of Reference 3.

Attachment 1 provides NPPD's response to the RAI provided by Reference 1. Attachment 2 provides NPPD's response to the RAI provided by Reference 2. Note that Reference 2 did not contain a Question 5.

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

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COOPER NUCLEAR STATION
P.O. Box 98 / Brownville, NE 68321-0098
***Telephone:** (402) 825-3811 / **Fax:** (402) 825-5211*
www.nppd.com

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

Executed on 9/28/04
(Date)

Sincerely,

Stewart B. Minahan
General Manager of Plant Operations

/rar

cc: Regional Administrator w/ attachments
USNRC - Region IV

Senior Project Manager w/ attachments
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/ attachments
USNRC

Nebraska Health and Human Services w/ attachments
Department of Regulation and Licensure

NPG Distribution w/o attachments

CNS Records w/ attachments

Response to "Request for Additional Information Regarding One Time Extension of Diesel Generator Allowed Outage Time (TAC No. MC3770)" Dated August 16, 2004

NRC Request:

(1) In Section 4.3 of the amendment request the licensee states that the temporary equipment required to perform diesel fuel movement will be located on an area of engineered fill, which is resistant to damage caused by seismic events. The licensee is requested to (a) provide the basis for this statement, including (b) a discussion of the level of earthquake ground motion and (c) the load transfer between the tank and the engineered fill. The licensee is also requested to discuss (d) the basis for the statement that the temporary equipment will remain functional during seismic events at this location, including (e) a description of the evaluation of the ability of temporary piping and (f) above-ground tank anchorages to withstand seismic loadings.

NPPD Response:

(1a) Basis for Resistance to Seismic Damage

The area in which the temporary storage tank(s) and pumping equipment are to be located is at the plant site grade surface (approximately elevation 903'-0") in the South East corner of the site Protected Area. The general area is best described as the area South of the existing Diesel Fuel Storage Tanks, East of the Condensate Storage Tank, and at the grade surface above the plant discharge tunnel (Seal Well Structure), which are shown on Burns and Roe drawing 4003 Updated Safety Analysis Report (USAR) reference drawing). This is an area in which the soil profile consists of highly compacted backfill down to the elevation of the bedrock at the site (approximate elevation 820'). This backfill, previously referred to as "engineered fill," is described as Type I Fill, or Structural Fill, as this level of compaction was utilized to provide the structural fill upon which the Class I and Class II Principal Structures were founded. This backfill was extended to grade around the Principal Structures, and is the same fill in which the Class I Diesel Fuel Storage Tanks and Class I Transfer Piping are imbedded. This fill is considered to be equivalent to the bedrock of the plant site, both in terms of structural stability, as well as in terms of the seismic input motion that structures found in, or upon, are subjected to during plant seismic events. Since the seismic ground motion is not amplified through this structural fill, the expected seismic input to the temporary equipment is expected to be low, such that the subject commercial components are not expected to be significantly damaged by the postulated seismic events.

(1b) Level of Earthquake Ground Motion

The structural fill does not amplify the design basis ground input motion of the postulated earthquakes, which is 0.10g for the Operating Basis Earthquake (OBE), and 0.20g for the

Safe Shutdown Earthquake (SSE). Thus, the maximum expected seismic input to the temporary equipment is 0.10g for the OBE condition, and 0.20g for the SSE condition.

(1c) Load Transfer to Temporary Equipment

The load transfer between the temporary tank is dependent on the type of tank in question. The credited 21,000 gallons of off-loaded fuel is planned to be stored in a tank that rests directly on the grade surface. The load transfer is via friction between the tank bottom and the grade surface.

(1d) Temporary Equipment Function During Seismic Events

The temporary installation is not intended to be a Class I Safety-Related installation, and is not intended to be capable of functioning during a seismic event. The "temporary equipment" is located such that the temporarily stored volume of fuel will remain available after a seismic event, as the tank is not expected to suffer catastrophic damage due to an earthquake because the expected seismic input is judged insufficient to result in a rupture of the tank. The pumping equipment will not be connected to Safety-Related power supplies, nor will the transfer hoses be connected to the "in-service" underground storage tank. If necessary, transfer hoses can be connected between the temporary storage tank and the "in-service" underground storage tank, to replenish the "in-service" supply to an operating Diesel Generator (DG) Unit. The volume of fuel in the temporary tank represents a portion of the total stored volume of fuel required to support the seven day mission time of the in-service DG Unit under Design Basis Accident conditions. This portion of fuel is not required to be available to the operating DG unit for at least 4 days, since the "in-service" underground tank will be filled to maximum capacity.

(1e) Evaluation of Temporary Piping

There are no plans to connect the "temporary equipment" to the "in-service" underground storage tank via piping. If necessary, transfer hoses can be connected between the temporary storage tank and the "in-service" underground storage tank. The hoses are flexible, and do not require evaluation for seismic loading conditions.

(1f) Evaluation of Temporary Tank Anchorage

The temporary storage tank is not planned to be anchored to the ground in any manner. The input seismic accelerations are judged to be insufficient to cause significant lateral displacement of the tank. No horizontal accelerations sufficient to cause overturning of the tank is expected to occur. There will be no hard piping connections that could be

damaged by differential movements caused by the earthquakes. As such, no anchorage of the temporary tank is considered necessary.

NRC Request:

(2) *The licensee is requested to provide bearing pressure and soil settlement data that might have been taken at the engineered fill location to assure that differential settlement is not occurring at this time and the soil bearing pressure is adequate to support the temporary equipment in a stable manner.*

NPPD Response:

(2) The "engineered fill" is the "Type I structural fill" which provides the structural support for the Class I and Class II Principal Structures at Cooper Nuclear Station. This fill is not expected to experience differential settlement or liquefaction during either of the Design Basis Seismic Events. This highly compacted soil has a minimum Design Basis allowable bearing pressure of 12,000 psf for the OBE condition, and 10,000 psf for the SSE condition. Based on the original Design Criteria for the structural fill, the bearing pressure is considered more than adequate to support the temporary equipment in a stable manner.

Response to "Request for Additional Information Regarding One Time Extension of Diesel Generator Allowed Outage Time (TAC No. MC3770)" Dated August 27, 2004

NRC Request:

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.*

NPPD Response:

1. Cooper Nuclear Station (CNS) Technical Specifications require two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System. The two qualified offsite power sources are a startup station service transformer (SSST) which connects to the 161 kV switchyard and a separate emergency station service transformer (ESST) energized by a 69 kV line. The 161 kV switchyard is connected to one 161 kV line which terminates in a switchyard near Auburn, Nebraska, and the 345/161 kV auto-transformer which connects to the 345 kV switchyard. The 345 kV switchyard has five lines which terminate in switchyards near Booneville, Iowa; Hallam, Nebraska; St. Joseph, Missouri; Fairport, Missouri; and Nebraska City, Nebraska. The ESST is fed by a 69 kV line which is part of a subtransmission grid of the Omaha Public Power District. The design of the offsite AC electrical power system provides independence and redundancy to ensure a reliable source of power to the Engineered Safety Feature systems.

   The automatic transfer to the SSST is a "fast transfer" scheme which prevents a significant voltage drop and is measured in cycles. The automatic transfer to the ESST is a dead bus transfer which involves a delay of approximately 1 second. The critical bus required loads are sequentially loaded to the buses after the transfer to the ESST.

   USAR Section VII-1.0 provides the following description:

   > If the normal station service transformer is lost, the startup station service transformer, which is normally energized, will automatically energize 4160 volt buses 1A and 1B as well as their connected loads, including the critical buses. If the startup station service transformer (SSST) fails to energize the critical buses, the emergency station service transformer, which is normally energized, will automatically energize both critical buses. If the emergency station service transformer (ESST) were also to fail, the DGs would automatically energize their respective buses.

Within the last five years, CNS has conducted three Refueling and a number of Forced Outages which required a planned transfer from the NSST to the SSST during shutdown and from the SSST to the Normal Station Service Transformer (NSST) during startup. A Forced Outage in the fall of 2000 involved a scram and successful automatic transfer from the NSST to the SSST.

A review of CNS total operating history indicates three events when a successful transfer to the SSST did not occur. The last event occurred in October of 1990. All three events started both diesel and transferred loads to the ESST. The station successfully shutdown on the ESST without loading either diesel.

The first event occurred in the 1970s, when only four 345 kV lines connected the CNS generator output and switchyard to the grid. A loss of three of the lines (from grid events) tripped the CNS generator due to the one remaining line's protective relaying tripping on the sudden increase of the entire generator output. The loss of all four lines de-energized the auto-transformer 161 kV supply to the SSST. The 69 kV supply to the ESST was unaffected and energized the critical buses. Both DGs started but did not load during this event.

The second event occurred in January 1984 with CNS operating without a NSST due to failure of the transformer in December 1983. The station was powered entirely from the SSST. Heavy wind conditions blew a piece of reactor building siding off and caused a phase-to-phase fault on the 161 kV lines supplying the SSST. The 161 kV breakers opened to isolate the fault. The generator tripped and plant scrammed on loss of AC power. The ESST was unaffected and energized the critical buses to shutdown the station. Both DGs started but did not load during this event.

The last event was in the October of 1990. An elevator power cable from a temporary exterior elevator to the Reactor Building roof was blown near a 345 kV generator output line causing a phase to ground fault. This caused a generator trip. A piece of the cable was blown into the 161 kV line causing a phase-to-phase fault on the 161 kV line preventing a transfer to the SSST. The ESST was unaffected and energized the critical buses to shutdown the station. Both DGs started but did not load during this event.

NRC Request:

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 corrective maintenance to the fuel oil storage tanks and transfer system is complete in order to declare the diesel generator (DG) operable. Provide justification for performing those tests at power.*

NPPD Response:

2. Post Maintenance Testing, in accordance with station surveillance procedures for the following activities, will be conducted at the conclusion of each divisional work window.

"DIESEL FUEL OIL AVAILABILITY" which satisfies Technical Specification (TS) Surveillance Requirements (SR) 3.8.3.1 to ensure an adequate inventory of fuel oil is available, and SR 3.8.3.5 which checks for and removes accumulated water from the storage tanks.

"DIESEL FUEL OIL STORAGE TANK, BUNKER A & B QUALITY TEST" satisfies TS SR 3.8.3.3, in part, to ensure fuel oil properties are within limits of the Diesel Fuel Oil Testing Program.

"DIESEL GENERATOR 31 DAY OPERABILITY TEST (IST)" which satisfies SR 3.8.1.2 to verify the DG starts from standby conditions and achieves required steady state voltage and frequency, SR 3.8.1.3 to verify the DG is synchronized, loaded, and operates for greater than 2 hours while loaded, SR 3.8.1.4 to verify fuel level in the day tank, SR 3.8.1.5 to remove accumulated water from the day tank, SR 3.8.1.7 to verify the DG starts and loads from standby conditions and achieves required voltage and frequency within 14 seconds and maintains the required voltage and frequency after steady state conditions are achieved, SR 3.8.3.2 which verifies lube oil inventory, and SR 3.8.3.4 which verifies the starting air system pressure.

"DIESEL GENERATOR FUEL OIL TRANSFER PUMP IST FLOW TEST" which satisfies conditions of TS Section 5.5.6, Inservice Testing Program.

Additionally, the diesel fuel oil duplex strainer will be inspected and cleaned.

The above post maintenance surveillance and testing activities are normal periodic activities that are routinely performed with the plant on-line.

NRC Request:

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?*

NPPD Response:

3. NPPDs "Interface Operating Agreement" between the Energy Delivery Business Unit (System Load Dispatcher) and the Nuclear Power Group Business Unit (CNS), and its implementing procedures, establish the required communications protocol.

The Energy Management System at the Doniphan Control Center (DCC) contains a State Estimator that models current grid conditions. The Security Analysis function models the impact of a defined set of contingencies on the model. The Security Analysis predicts what voltage will be provided by the ESST or SSST under the conditions of the contingency. Each contingency specifies a CNS generator trip and accident loading of the associated transformer(s). If the predicted voltage is below that which is required then it is prudent to declare the effected transformer and line inoperable. Required voltage is greater than 3950 volts on the safety related 4160 volt buses, which is above the second level undervoltage relay reset value. This provides a high level of assurance that multiple load shedding and sequencing of safety related loads would not occur. The use of the State Estimator and Security Analysis supercedes the previous worst-case analysis voltage limits. However, these voltage limits are still used as a backup method in the event the Security Analysis is out of service.

The Security Analysis solves every 10 minutes and following system configuration changes. The following three CNS specific 4160 volt violation scenarios, directly related to the operability of our offsite sources, are built into the Security Analysis.

1. Cooper Unit Off-Line, SSST Voltage. Post unit trip undervoltage 95% of 4160V, or overvoltage 105% of 4160V, with post trip station service load on SSST.

2. Cooper Unit Off-Line, ESST Voltage. Post unit trip undervoltage 95% of 4160V, or overvoltage 105% of 4160V, with post trip station service load on ESST.

3. Cooper Generator Off and T-2 Open, ESST Voltage. Post unit trip undervoltage 95% of 4160V, or overvoltage 105% of 4160V, with post trip station service load on ESST.

Contingencies that have predicted violations are reported to the DCC System Operator via the violation summary display. When a Security Analysis Violation occurs the Energy Delivery Operators are required to notify the CNS Control Room, and entry into procedure 5.3GRID, Degraded Grid Voltage, is required.

Communication between the CNS Control Room and the System Load Dispatcher can be accomplished via normal land telephone lines, dedicated trunk lines and a microwave

telephone system. Additional communication methods available are through National Weather Service radio communication or relaying with law enforcement agencies.

Technical Specifications require verification of proper circuit continuity for the off-site AC electrical power supply to the on-site distribution network and availability of off-site AC electrical power when Limiting Conditions for Operation associated with an inoperable diesel generator are entered. Performance of this verification requires communication with the System Load Dispatcher.

The Special Procedure governing the fuel tank maintenance activity will establish additional controls for the required communication during the tank maintenance activity. No other scheduled activities (i.e., corrective or elective maintenance) challenging offsite power sources, including the secondary & emergency transformers will be planned for the duration of the storage tank coating activities. Existing administrative controls for coordination of work in switch yards and transformer yards will be utilized to minimize the risk of power loss to equipment important to plant safety. It will be a specific requirement of the Special Procedure to ensure that this information is communicated to the System Load Dispatcher.

NRC Request:

4. *Other licensees who requested for DG allowed outage time (AOT) extension provided the following Regulatory Commitments in their requests.*

   A. *Whether 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 switch yard will be evaluated prior to entering the extended AOT.*

   C. *No discretionary switch yard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary or startup transformers associated with the unit.*

   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 feed water 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 a 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.

NPPD Response:

4. During the extended Allowed Outage Time (AOT) the inoperable DG will be maintained available to start and load and will be capable of a minimum five hours of full load operation using fuel in its' associated day tank. The fuel tank maintenance activity will be conducted during a work week that normally supports DG maintenance. However, no planned activities which would impact the ability of the DG to start and load will be performed on the inoperable DG.

   A. Weather Conditions

      The Special Procedure for the fuel tank maintenance activity will contain the requirement to evaluate weather conditions prior to entering the activity.

   B. Offsite Power Supply Evaluation

      Technical Specifications require verification of proper circuit continuity for the off-site AC electrical power supply to the on-site distribution network and availability of off-site AC electrical power when Limiting Conditions for Operation associated with an inoperable diesel generator are entered. This surveillance will be performed in advance of moving the DG fuel supply to the

temporary storage tanks. Performance of this verification requires communication with the System Load Dispatcher.

In addition, the Special Procedure for the fuel tank maintenance activity will provide control to ensure this evaluation is performed prior to moving the fuel supply to the temporary tanks. The DG associated with the drained fuel oil storage tank will remain available to start and load with fuel supplied from its day tank. Defense-in-depth strategies to supply fuel to the inoperable but available DG from permanent and temporary storage facilities have been developed.

C. Discretionary Switchyard Maintenance

NPPD provided the following commitment in the initial License Amendment Request:

> Plant activities with the potential to challenge diesel generator operability or availability, or availability of Emergency Core Cooling Systems, critical switchgear/electrical buses, offsite power sources or safety related cooling water systems will not be planned for the duration of the fuel tank maintenance activities.

Discretionary maintenance affecting the switchyard and transformers is included in the above commitment.

D. Maintenance Affecting Operable Diesel Generator

NPPD provided the commitment noted in "C" (above) in the initial License Amendment Request. Maintenance or testing that affects the reliability of the train associated with the operable DG is included in that commitment. NPPD has additionally committed to maintain the inoperable DG available to start and load. If any emergent plant activities that affects the reliability of the train associated with the OPERABLE DG were to arise, CNS is obligated by 10 CFR 50.65 to perform the specified evaluation.

E. Steam Driven Pumps

NPPD provided the commitment noted in "C" (above) in the initial License Amendment Request. With regard to Steam Driven Pumps, NPPD is a General Electric Boiling Water Reactor 4 and does not have emergency feedwater pumps. The High Pressure Coolant Injection (HPCI) system is a steam driven system with the capability to restore reactor vessel inventory. HPCI is included in the

Emergency Core Cooling Systems and will remain available during the fuel tank maintenance activities.

F. Daily Diesel Generator Status

The special procedure for the fuel tank maintenance activity will provide control for including communication of the DG status and CNS power needs to the system dispatcher on a daily basis for the duration of the activity. In addition, a grid security computer program provides near real time analysis of the condition of the grid.

G. Review of Operating Procedures

The Special Procedure for the fuel tank maintenance activity will require the Operations crew to review appropriate normal and emergency procedures prior to assuming the watch while the extended AOT is in effect.

H. Briefing of Unit Activities

The Special Procedure for the fuel tank maintenance activity will require the briefing of the operations crew concerning unit activities and measures to perform the defense-in-depth activities to ensure fuel oil is supplied to the DGs to support 7 days of full load operation, prior to assuming the watch while the extended AOT is in effect.

NRC Request:

6.[sic] *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 a 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."*

NPPD Response:

6. NPPD has implemented the recommendations of the Institute of Nuclear Power Operations, Significant Operating Experience Report 99-1, "Loss of Grid." The implemented actions include agreements, procedures, calculations and training to ensure a reliable off-site power system. The maintenance activity to clean and coat the storage tanks does not increase the probability of a Station Black Out (SBO) due to maintaining the inoperable DG available to start and load.

During the tank maintenance activities, both DGs will remain available to start and load in the event a SBO would occur. CNS has developed defense-in-depth strategies to ensure the 49,500 gallon fuel oil inventory required to support seven days of fully loaded operation can be supplied to either DG as necessary. A minimum 28,500 gallons of fuel oil (greater than 4 days operation) will be stored in fully qualified permanent storage tanks with 21,000 gallons of fuel stored in a temporary above ground tank located on engineered fill. In the unlikely event that fuel in the temporary tank were to become unavailable to support operation of the DG beyond 4 days, replenishment of fuel from offsite can be accomplished in approximately 24 hours. NPPD has verified the supplier's capability to deliver replenishment fuel independent of AC power sources.

NRC Request:

7.[sic] *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 be protected from site traffic and ongoing maintenance and construction activities.*

NPPD Response:

7. Temporary equipment will not be connected to diesel oil storage and transfer system to support diesel generator operation during the tank coating maintenance activity. The equipment to transfer fuel oil from the temporary storage tanks to support diesel generator operation, in accordance with contingency and defense-in-depth plans, will be pre-staged to ensure it is available in the event of a diesel generator start. Additional staffing will be continuously available to implement the defense-in-depth plans. The inoperable DG will remain available to start and load throughout the maintenance activity.

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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
Existing administrative controls for coordination of work in switchyards and transformer yards will be utilized to minimize the risk of power loss to equipment important to plant safety. It will be a specific requirement of the Special Procedure to ensure that this information is communicated to the System Load Dispatcher.	October 20, 2004
The Special Procedure for the fuel tank maintenance activity will contain the requirement to evaluate weather conditions prior to entering the activity.	October 20, 2004
The Special Procedure for the fuel tank maintenance activity will provide control to ensure this evaluation (verification of proper circuit continuity for the off-site AC electrical power supply to the on-site distribution network and availability of off-site AC electrical power when Limiting Conditions for Operation associated with an inoperable diesel generator are entered) is performed prior to moving the fuel supply to the temporary tanks.	October 20, 2004
The special procedure for the fuel tank maintenance activity will provide control for including communication of the DG status and CNS power needs to the system dispatcher on a daily basis for the duration of the activity.	October 20, 2004
The Special Procedure for the fuel tank maintenance activity will require the Operations crew to review appropriate normal and emergency procedures prior to assuming the watch while the extended AOT is in effect.	October 20, 2004
The Special Procedure for the fuel tank maintenance activity will require the briefing of the operations crew concerning unit activities and measures to perform the defense-in-depth activities to ensure fuel oil is supplied to the DGs to support 7 days of full load operation, prior to assuming the watch while the extended AOT is in effect.	October 20, 2004

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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
Requirements for Post Maintenance Testing, in accordance with station surveillance procedures for the following activities (DIESEL FUEL OIL AVAILABILITY, DIESEL FUEL OIL STORAGE TANK, BUNKER A & B QUALITY TEST, DIESEL GENERATOR 31 DAY OPERABILITY TEST (IST) and DIESEL GENERATOR FUEL OIL TRANSFER PUMP IST FLOW TEST) and duplex strainer inspection and cleaning to be conducted at the conclusion of each divisional work window will be included in the Special Procedure.	October 20, 2004