



**Nebraska Public Power District**

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NLS2004137  
November 5, 2004

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

**Subject:** Supplemental Response to Request for Additional Information Regarding  
Revision of Technical Specification Surveillance Requirement 3.3.2.1.4 and Table  
3.3.2.1-1  
Cooper Nuclear Station, Docket 50-298, DPR-46

- Reference:**
1. Letter to R. K. Edington, Nebraska Public Power District, from M. C. Honcharik, U.S. Nuclear Regulatory Commission, dated August 13, 2004, "Request for Additional Information Regarding Revision of Technical Specification Surveillance Requirement 3.3.2.1.4 and Table 3.3.2.1-1 (TAC No. MC0629)"
  2. Letter from R. K. Edington, Nebraska Public Power District, to U. S. Nuclear Regulatory Commission dated March 9, 2004, "Response to Request for Additional Information Regarding Licensing Amendment Request to Revise Technical Specifications (TS) Surveillance Requirements and TS Table for Mathematical Symbols and Use of Allowable Values in the Place of Analytical Limits" (NLS2004006)

The purpose of this letter is for the Nebraska Public Power District (NPPD) to submit to the Nuclear Regulatory Commission (NRC) the response to the Request for Additional Information (RAI) provided in Reference 1. This RAI requested additional information regarding the previously submitted RAI response of Reference 2. The information provided by this response was discussed with the NRC staff during a telephone conference conducted on October 19, 2004. This RAI response is limited to supplying information to assist the NRC in completing the license amendment review and does not change the conclusion of the original No Significant Hazards Consideration. The response is attached.

If you have any questions regarding this matter please call Paul Fleming, Licensing Manager, at (402) 825-2774.

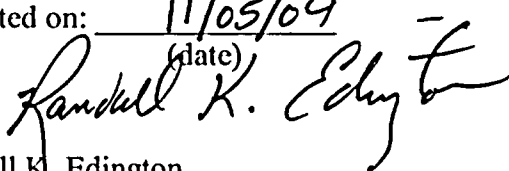
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 11/05/04  
(date)

  
Randall K. Edington  
Vice President Nuclear and Chief Nuclear Officer

/clb

Attachment

cc: Regional Administrator w/attachment  
USNRC - Region IV

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

Senior Resident Inspector w/attachment  
USNRC

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

NPG Distribution w/attachment

Records w/attachment

**Supplemental Response to Request for Additional Information Regarding Revision  
of Technical Specification Surveillance Requirement 3.3.2.1.4 and Table 3.3.2.1-1**

**Cooper Nuclear Station, Docket 50-298, DPR-46**

NRC Request

*The response to question 1 stated: "The calculation Conclusion Section lists a set of permissible rod block values for AL, AV and Operating Setpoint, based on different MCPR [minimum critical power ratio] limits... Therefore, the setpoints for the various regions were selected based on a MCPR Limit of 1.30..." How does the NPPD justify using what appears to be a slightly less conservative value of MCPR?*

NPPD Response

This request refers to Question 1 of Reference 2. The NRC approved use of the Extended Load Line Limit and ARTS Improvement Program Analyses for Cooper Nuclear Station Cycle 14, NEDC-31892P, Rev 1, May 1991 by Amendment 151 dated November 29, 1991.

Section 5.5 of Extended Load Line Limit and ARTS Improvement Program Analyses for Cooper Nuclear Station Cycle 14, (NEDC-31892P, Rev 1, DRF B13-01512 Dated May 1991) states in part:

Any set of RBM [Rod Block Monitor] setpoints with a corresponding OLMCPR [Operating Limit Minimum Critical Power Ratio] equal to or less than that of the limiting plant OLMCPR based on the other transient results can be utilized. The higher RBM setpoints (with a higher OLMCPR value) will afford more control rod movement flexibility without unnecessary alarms and rod blocks.

This statement means that selection of the RBM setpoint based on the lower MCPR value is conservative. The trip setpoint decreases as the MCPR value decreases. A lower value of MCPR is closer to the safety limit. Operationally, this means the RBM upscale trip will occur and block rod movement at a lower power level. The example discussed in the response to Question 1 of Reference 2 assumes a 1.32 MCPR value. The trip setpoint based on a MCPR of 1.30 will initiate a rod block at a lower power level than a trip setpoint based on the Rod Withdrawal Error (RWE) MCPR of 1.32, thereby, resulting in a smaller decrease in MCPR during an RWE event (i.e., more margin to the safety limit).

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

Correspondence Number: NLS2004137

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	