



Nebraska Public Power District

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NLS2005014

January 26, 2005

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

Subject: Regulatory Commitment Related to Control Blade Shadow Corrosion-Induced
Channel Bow
Cooper Nuclear Station, Docket 50-298, DPR-46

- Reference:**
1. Letter to U.S. Nuclear Regulatory Commission from Randall K. Edington (Nebraska Public Power District) dated October 25, 2004, "License Amendment Request to Revise Technical Specifications - Safety Limit Minimum Critical Power Ratio" (NLS2004099)
 2. Letter to R.K. Edington (Nebraska Public Power District) From M.C. Honcharik (Nuclear Regulatory Commission) dated December 3, 2004, "Cooper Nuclear Station - Request for Additional Information on License Amendment Request to Review Technical Specifications (TS) - Safety Limit Minimum Critical Power Ratio (SLMCPR)" (TAC NO. MC4953)
 3. Letter to U.S. Nuclear Regulatory Commission from Stewart B. Minahan (Nebraska Public Power District) dated December 29, 2004, "Response to Request for Additional Information on License Amendment Request to Review Technical Specifications - Safety Limit Minimum Critical Power Ratio" (NLS2004168)

The purpose of the letter is for the Nebraska Public Power District (NPPD) to make a regulatory commitment related to Reference 1. Reference 1 requested a revision to Cooper Nuclear Station (CNS) Technical Specifications for Safety Limit Minimum Critical Power Ratio (SLMCPR). Reference 2 requested additional information to support the Nuclear Regulatory Commissions (NRC) review of the amendment request. Reference 3 provided the responses to the questions contained in Reference 2.

Question 1 of Reference 2 discussed control blade shadow corrosion-induced channel bow and the approved R-factor uncertainty. The response to this question stated:

"Should Cooper have conclusive evidence that control blade shadow corrosion-induced channel bow is occurring at a level that would cause the approved basis for the R-factor uncertainty to be exceeded, NPPD will submit to the NRC for review the

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justification that the higher R-factor is sufficiently conservative so as to not invalidate the SLMCPR value that constitutes the licensing basis.”

NPPD considered this to be an obligation of the license and thus did not include a regulatory commitment. By telephone the NRC Project Manager requested that NPPD make this a formal commitment.

Therefore NPPD makes the following commitment:

“Should CNS have conclusive evidence that control blade shadow corrosion-induced channel bow is occurring at a level that would cause the approved basis for the R-factor uncertainty to be exceeded, NPPD will submit to the NRC for review the justification that the higher R-factor is sufficiently conservative so as to not invalidate the SLMCPR value that constitutes the licensing basis.”

This letter does not change the original submittal or the answers to the No Significant Hazards Consideration questions.

This letter is submitted under oath pursuant to 10 CFR 50.30(b). By copy of this letter the appropriate State of Nebraska official is notified in accordance with 10 CFR 50.91(b)(1). Copies are being provided to the NRC Region IV office and the Cooper Nuclear Station Resident Inspector in accordance with 10 CFR 50.4(b)(1).

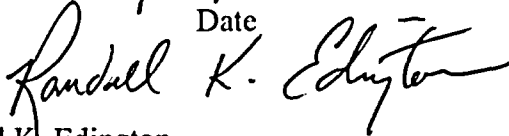
Should you have any questions concerning this matter, please contact Mr. Paul Fleming at (402) 825-2774.

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

Executed On:

1/26/05

Date



Randall K. Edington

Vice President Nuclear & CNO

/cb

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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/o attachment

Records w/ attachment

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

Correspondence Number: NLS2005014

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
Should CNS have conclusive evidence that control blade shadow corrosion-induced channel bow is occurring at a level that would cause the approved basis for the R-factor uncertainty to be exceeded, NPPD will submit to the NRC for review the justification that the higher R-factor is sufficiently conservative so as to not invalidate the SLMCPR value that constitutes the licensing basis.	TBD