



Nebraska Public Power District
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NLS2005055
June 17, 2005

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

Subject: Revised Commitments for NRC Generic Letter 2003-001, "Control Room Habitability"
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Reference: Letter from R. Edington (Nebraska Public Power District) to the U.S. Nuclear Regulatory Commission dated September 30, 2004, "Initial Actions Summary Report and Response to NRC Generic Letter 2003-001, 'Control Room Habitability' " (NLS2004105)

The purpose of this letter is to advise the Nuclear Regulatory Commission (NRC) of revisions to commitments made in the referenced response to Generic Letter 2003-001 for the Cooper Nuclear Station (CNS). The specifics of the requested commitment change and the basis for the change are presented in the attachment.

These revisions of the commitments were discussed with the NRC Project Manager for CNS, and verbally approved, during a telephone conference conducted on May 31, 2005.

Should you have any questions or require additional information, please contact Paul Fleming, Licensing Manager, at (402) 825-2774.

Randall K. Edington
Vice President – Nuclear and
Chief Nuclear Officer

/rr

Attachment

cc: Regional Administrator w/ attachment Senior Project Manager w/ attachment
USNRC – Region IV USNRC – NRR Project Directorate IV-1
Senior Resident Inspector w/ attachment NPG Distribution w/o attachment
USNRC
CNS Records w/ attachment

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Attachment 1

**Discussion of Revised Commitment for
Generic Letter 2003-01, "Control Room Habitability"
Nebraska Public Power District
Cooper Nuclear Station**

Reference: Letter from R. Edington (Nebraska Public Power District) to the U.S. Nuclear Regulatory Commission dated September 30, 2004, "Initial Actions Summary Report and Response to NRC Generic Letter 2003-001, 'Control Room Habitability' " (NLS2004105)

1. Current Commitment No. 1

"CNS plans to submit a License Amendment Request to propose revisions to the Technical Specification surveillance requirements to utilize a more direct measurement method to verify Control Room Envelope integrity in addition to the periodic positive pressure surveillance on or before June 30, 2005. The planned Amendment Request will include a proposed revision to TS Section 5.5, Programs and Manuals, to implement a Control Room Integrity Program."

Background

The referenced letter was the Nebraska Public Power District (NPPD) response to Nuclear Regulatory Commission (NRC) Generic Letter 2003-001 for Cooper Nuclear Station (CNS). In Section 2.9 of Attachment 1 of this letter, NPPD stated that the Control Room Envelope (CRE) tracer gas testing performed in July 2004 had revealed that some unfiltered in-leakage exists despite the ability to successfully demonstrate a positive pressure in the Control Room. This section further stated that CNS plans to submit a License Amendment Request (LAR) to propose revisions to the Technical Specification (TS) Surveillance Requirements (SRs) to utilize a more direct measurement method to verify CRE integrity in addition to the periodic positive pressure surveillance. This discussion was reiterated in "NPPD Response to Item 1(c)" in Section 3.1, also specifying that the License Amendment Request would be submitted no later than June 30, 2005. This was reiterated a third time in Section 4.1, with an additional statement that the planned Amendment Request will include a proposed revision to TS Section 5.5, Programs and Manuals, to implement a Control Room Integrity Program.

Revised Commitment

"Nebraska Public Power District (NPPD) will submit a license amendment request addressing the monitoring of control room inleakage for the Cooper Nuclear Station within 12 months following NRC approval of TSTF-448, "Control Room Habitability."

Basis for Revised Commitment

NPPD is monitoring the ongoing interactions between the staff of the NRC and the industry (i.e., the Nuclear Energy Institute, Excel Services, and the Technical Specification Task Force [TSTF]), to resolve differences with respect to the scope and format of TSTF Traveler 448, Revision 1, "Control Room Habitability." The outcome of these interactions will be NRC approval of TSTF-448.

NPPD considers it prudent to adopt revised technical specifications that are based on the approved changes to Standard Technical Specifications as reflected in TSTF-448. For that reason NPPD will await the outcome of the efforts currently in progress to resolve differences with the NRC staff regarding the scope and format of the Technical Specifications as proposed in TSTF-448, and final NRC approval of TSTF-448 before submitting proposed TS. Note that the technical specifications proposed in TSTF-448 include a Control Room Integrity Program as TS Section 5.5.15, as was included in the original commitment.

2. Current Commitment No. 2

"A Control Room Integrity Program document and Control Room Envelope Breach Control procedure are expected to be implemented by May 31, 2005."

Background

In Section 3.1 of Attachment 1 of the referenced letter, NPPD stated that CNS is developing a more formal Control Room Integrity Program to provide assurance that a safe environment is maintained in which the operator can control the nuclear reactor and auxiliary systems during normal operation and can safely shut down these systems during abnormal situations. Also stated was that the Control Room Integrity Program will delineate the critical attributes required to ensure Control Room habitability is maintained at CNS, consistent with the intent of Generic Letter 2003-01.

Revised Commitment

"A Control Room Integrity Program document and Control Room Envelope Breach Control Procedure will be developed as part of the implementation of the approved Technical Specification for Control Room Envelope Integrity per TSTF-448."

Basis for Revised Commitment

The current commitment was predicated on knowing what requirements the proposed Technical Specification for Control Room Envelope Integrity would impose. Currently there is not a consensus between the NRC staff and the industry on the scope and format of TSTF-448. It would be premature to develop the Control Room Integrity Program document and Control Room Envelope Breach Control Procedure prior to reaching that consensus.

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

Correspondence Number: NLS2005055

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 Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
Nebraska Public Power District (NPPD) will submit a license amendment request addressing the monitoring of control room inleakage for the Cooper Nuclear Station within 12 months following NRC approval of TSTF-448, "Control Room Habitability.	NLS2005055-01	Within 12 months following NRC approval of TSTF-448
A Control Room Integrity Program document and Control Room Envelope Breach Control Procedure will be developed as part of the implementation of the approved Technical Specification for Control Room Envelope Integrity per TSTF-448.	NLS2005055-02	Implementation of the license amendment