

Always there when you need us

NLS2007029 May 7, 2007

U.S. Nuclear Regulatory Commission Attention: Document Control Desk 11555 Rockville Pike Rockville, MD 20852

Subject:

Response to Generic Letter 2007-01

Cooper Nuclear Station; Docket No. 50-298, DPR-46

References:

- 1. NRC Generic Letter 2007-01, dated February 7, 2007, Inaccessible or Underground Power Cable Failures That Disable Accident Mitigation Systems or Cause Plant Transients
- 2. NEI Letter from J. H. Riley to Administrative Points of Contact, dated March 16, 2007, Guidance for Response to GL 2007-01
- 3. NRC Letter from Michael J. Case to J. H. Riley, dated April 13, 2007, Response to Nuclear Energy Institute (NEI) Letter Dated March 26, 2007 RE: Interpretation of Generic Letter (GL) 2007-01, Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients

Dear Sir or Madam:

The purpose of this letter is for the Nebraska Public Power District (NPPD) to provide the information requested in Reference 1:

- 1. Provide a history of inaccessible or underground power cable failures for all cables that are within the scope of 10 CFR 50.65 (the Maintenance Rule) and for all voltage levels. Indicate the type, manufacturer, date of failure, type of service, voltage class, years of service, and the root causes for the failure.
- 2. Describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables that support EDGs, offsite power, ESW, service water, component cooling water and other systems that are within the scope of 10 CFR 50.65 (the Maintenance Rule).

In researching plant records for the requested information, Cooper Nuclear Station used the Nuclear Energy Institute and Nuclear Regulatory Commission guidance provided in References 2 and 3 to clarify the population of cables of interest. Databases researched included station

NLS2007029 Page 2 of 2

Paperless Condition Reporting System (PCRS), Plant Master Data, and Maintenance History. To date, CNS has experienced zero (0) cable failures within the scope of the GL.

In response to Question 2, CNS inspection, testing and monitoring practices for inaccessible or underground power cables presently include periodic meggering of 4160 and 480VAC motors and feeder cables. The duct banks for the safety related service water pumps are sloped downward toward manholes with sump pumps and control room alarms for high water level. Plant condition reporting is used to determine root cause and extent of condition where deemed necessary and would be the mechanism for determining the need for, and extent of, any increased cable monitoring.

Should you have any questions regarding this submittal, please contact Paul Fleming, Licensing Manager, at (402) 825-2774.

The requested information is being provided under 10 CFR 50.54(f). I declare under penalty of perjury that the foregoing is true and correct.

Executed on $\frac{5}{7}/\frac{07}{07}$.

Sincerely,

Stewart B. Minahan

Vice President-Nuclear and Chief Nuclear Officer

/jf

cc:

Regional Administrator USNRC - Region IV

Cooper Project Manager

USNRC – NRR Project Directorate IV-1

Senior Resident Inspector USNRC – CNS

Nebraska Health and Human Service Department of Regulation and Licensure

NPG Distribution

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS®

Correspondence Number: NLS2007029

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
None		

PROCEDURE 0.42 REVISION 20 PAGE 18 OF 25