



Nebraska Public Power District

"Always there when you need us"

NLS2009035

May 7, 2009

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

Subject: Revision to Commitment Made in Nine-Month Response to NRC Generic Letter 2008-01
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Reference: Letter from Stewart B. Minahan, Nebraska Public Power District, to the U.S. Nuclear Regulatory Commission, dated October 10, 2008, "Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

Dear Sir or Madam:

The purpose of this letter is to communicate the revision of a commitment made to the Nuclear Regulatory Commission (NRC) in the above reference in support of Cooper Nuclear Station's (CNS) response to Generic Letter 2008-01. In that letter, the Nebraska Public Power District (NPPD) committed to conduct ultrasonic testing (UT) of locations identified in the condition reports (CRs) to provide additional confirmation that High Pressure Coolant Injection (HPCI), Core Spray (CS), and Residual Heat Removal (RHR) systems are operable and to assist in determining future vent locations. The commitment completion date was February 27, 2009.

This commitment has been revised as follows: NPPD will conduct UT, where practical, of locations identified in the CRs to provide additional confirmation that HPCI, CS, and RHR are operable and to assist in determining future vent locations. Where UT is not practical, an evaluation will be performed to assess whether potential gas accumulation could affect system operation. The new commitment completion date is July 31, 2009.

The revised commitment and due date are a reflection of lessons learned by NPPD from the conduct of UTs performed, thus far, and from subsequent planning. UT results may be inaccurate due to piping or component configuration. In some cases, the possible gas pocket size may have negligible effect on the system based on preliminary analyses performed to date. As such, the revised commitment clarifies that UTs will be conducted, "where practical," and where UT is not practical, "an evaluation will be performed."

The change in schedule is also supported by the UT results acquired to date. UT examinations were performed on many of the larger piping locations where larger gas pockets may exist and

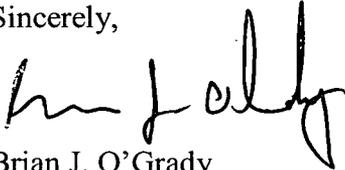
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the results identified only one void. The void was evaluated and it was determined that the void did not exceed industry acceptance guidelines.

With respect to the missed due date, this condition has been entered into the CNS corrective action program. Both the missed due date and the need for the commitment revision have been discussed with the NRC Project Manager for CNS.

If you have questions concerning this matter, please contact David Van Der Kamp, Licensing Manager at (402) 825-2904.

Sincerely,



Brian J. O'Grady
Site Vice President

/dm

cc: Regional Administrator
USNRC – Region IV

Cooper Project Manager
USNRC – NRR Project Directorate IV-1

Senior Resident Inspector
USNRC – CNS

NPG Distribution

CNS Records

Correspondence Number: NLS2009035

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
NPPD will conduct UT, where practical, of locations identified in the CRs to provide additional confirmation that HPCI, CS, and RHR are operable and to assist in determining future vent locations. Where UT is not practical, an evaluation will be performed to assess whether potential gas accumulation could affect system operation.	NLS2008081-06	July 31, 2009