Nebraska Public Power District
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50.90

NLS2009034
June 2, 2009

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

Subject: Application for Technical Specification Change Regarding Revision of Control Rod Notch Surveillance Test Frequency and Clarification of a Frequency Example Using the Consolidated Line Item Improvement Process
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Reference: Federal Register Notice 72 FR 63935, published November 13, 2007, Notice of Availability of Model Application Concerning Technical Specification Improvement to Revise Control Rod Notch Surveillance Frequency, Clarify SRM Insert Control Rod Action, and Clarify Frequency Example

Dear Sir or Madam:

The purpose of this letter is for the Nebraska Public Power District (NPPD) to request an amendment to Facility Operating License DPR-46 in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90 to revise the Cooper Nuclear Station (CNS) Technical Specifications (TS). The proposed amendment would: (1) delete TS Surveillance Requirement (SR) 3.1.3.2 and revise SR 3.1.3.3 in TS 3.1.3, "Control Rod OPERABILITY", and (2) revise Example 1.4-3 in Section 1.4 "Frequency" to clarify the applicability of the 1.25 surveillance test interval extension consistent with the model application in the Reference.

Attachment 1 provides a description of the TS changes, the basis for the amendment, the no significant hazards consideration evaluation pursuant to 10 CFR 50.91(a)(1), and the environmental impact evaluation pursuant to 10 CFR 51.22. Attachment 2 provides the proposed changes to the current CNS TS in marked up format. Attachment 3 provides the final typed TS pages to be issued with the amendment. Attachment 4 provides a summary of the regulatory commitments made in this submittal. Attachment 5 provides conforming changes to the TS Bases for Nuclear Regulatory Commission (NRC) information.

NPPD requests approval of the proposed amendment by May 31, 2010. Once approved, the amendment will be implemented within 60 days.

This proposed TS change has been reviewed by the necessary safety review committees (Station Operations Review Committee and Safety Review and Audit Board). Amendments to the CNS Facility Operating License through Amendment 232 issued March 20, 2009, have been incorporated into this request.

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NRR

By copy of this letter and its attachments, the appropriate State of Nebraska official is notified in accordance with 10 CFR 50.91(b)(1). Copies are also being provided to the NRC Region IV office and the CNS Senior Resident Inspector in accordance with 10 CFR 50.4(b)(1).

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

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

Executed on June 2 2009
(Date)

Sincerely,

Stewart B. Minahan
Vice President - Nuclear and
Chief Nuclear Officer

/em

Attachments
1. Description and Assessment
2. Proposed Technical Specifications Changes
3. Revised Technical Specification Pages
4. Regulatory Commitments
5. Proposed Technical Specification Bases Changes

cc: Regional Administrator w/attachments
USNRC - Region IV

Cooper Project Manager w/attachments
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/attachments
USNRC - CNS

Nebraska Health and Human Services w/ attachments.
Department of Regulation and Licensure

NPG Distribution w/o attachments

CNS Records w/attachments

Attachment 1

**Application for Technical Specification Change Regarding
Revision of Control Rod Notch Surveillance Test Frequency and
Clarification of a Frequency Example
Using the Consolidated Line Item Improvement Process**

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

1.0 Description

2.0 Assessment

2.1 Applicability of Published Safety Evaluation

2.2 Optional Changes and Variations

3.0 Regulatory Analysis

3.1 No Significant Hazards Consideration Determination

3.2 Verification and Commitments

4.0 Environmental Evaluation

Attachment 1

Description and Assessment

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

1.0 Description

The proposed amendment would: (1) delete Technical Specification (TS) Surveillance Requirement (SR) 3.1.3.2 and revise SR 3.1.3.3 in TS 3.1.3, "Control Rod OPERABILITY", and (2) revise Example 1.4-3 in Section 1.4 "Frequency" to clarify the applicability of the 1.25 surveillance test interval extension.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard TS change TSTF-475-A, Revision 1. The Federal Register Notice, published on November 13, 2007, announced the availability of this TS improvement through the consolidated line item improvement process (CLIIP).

2.0 Assessment

2.1 Applicability of Published Safety Evaluation

Nebraska Public Power District (NPPD) has reviewed the safety evaluation dated November 13, 2007, as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-475-A, Revision 1. NPPD has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Cooper Nuclear Station (CNS) and justify this amendment for the incorporation of the changes to CNS TS.

2.2 Optional Changes and Variations

NPPD is proposing two variations from the TS changes described in TSTF-475-A, Revision 1. The first variation is to reflect not renumbering the remaining SRs after deleting SR 3.1.3.2. This eliminates the need to revise Table 3.1.4-1. The second variation is in the Bases for SR 3.1.3.3 to reflect just the single SR 3.1.3.3 and to apply the potential power reduction basis to all withdrawn control rods rather than just those partially withdrawn. This conforms the Bases to the SR.

3.0 Regulatory Analysis

3.1 No Significant Hazards Consideration Determination

NPPD has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. NPPD has concluded that the proposed NSHCD presented in the Federal Register Notice is applicable to CNS and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on November 13, 2007, for this TS improvement, NPPD verifies the applicability of TSTF-475-A to CNS, and commits to establishing Technical Specification Bases as proposed in TSTF-475-A, Revision 1, with the variations noted.

These changes are based on TSTF change traveler TSTF-475-A, Revision 1, that proposes revisions to the Standard TS by: (1) Revising the frequency of SR 3.1.3.2, notch testing of fully withdrawn control rod, from 7 days after the control rod is withdrawn and THERMAL POWER is greater than the Low Power Setpoint (LPSP) of the Rod Worth Minimizer (RWM) to 31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM, and (2) revising Example 1.4-3 in Section 1.4, "Frequency," to clarify that the 1.25 surveillance test interval extension in SR 3.0.2 is applicable to time periods discussed in NOTES in the "SURVEILLANCE" column in addition to the time periods in the "FREQUENCY" column.

4.0 Environmental Evaluation

NPPD has reviewed the environmental evaluation included in the model safety evaluation dated November 13, 2007, as part of the CLIIP. NPPD has concluded that the staff's findings presented in that evaluation are applicable to CNS and the evaluation is hereby incorporated by reference for this application.

Attachment 2

**Proposed Technical Specification Revisions
(Markup)**

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

Revised Technical Specification Pages

1.4-4
1.4-5
3.1-8
3.1-10

EXAMPLES

EXAMPLE 1.4-2 (continued)

"Thereafter" indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the "once" performance in this example). If reactor power decreases to < 25% RTP, the measurement of both intervals stops. New intervals start upon reactor power reaching 25% RTP.

EXAMPLE 1.4-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
----------NOTE---------- Not required to be performed until 12 hours after ≥ 25% RTP. ----------	
Perform channel adjustment.	7 days

The interval continues whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required performance of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be within the "specified Frequency." Therefore, if the Surveillance were not performed within the 7 day interval (plus the extension allowed by SR 3.0.2), but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours with power ≥ 25% RTP.

(plus the extension allowed by SR 3.0.2)

(continued)

1.4 Frequency

EXAMPLES

EXAMPLE 1.4-3 (continued)

(plus the extension allowed by SR 3.0.2)

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

EXAMPLE 1.4-4

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
----------NOTE---------- Only required to be met in MODE 1. ----------	
Verify leakage rates are within limits.	24 hours

Example 1.4-4 specifies that the requirements of this Surveillance do not have to be met until the unit is in MODE 1. The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an "otherwise stated" exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), but the unit was not in MODE 1, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES, even with the 24 hour Frequency exceeded, provided the MODE change was not made into MODE 1. Prior to entering MODE 1 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.3	Perform ~~SR 3.1.3.2~~ and SR 3.1.3.3 for each withdrawn OPERABLE control rod.	24 hours from discovery of Condition A concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM.
	AND		
	A.4	Perform SR 3.1.1.1.	72 hours
B. Two or more withdrawn control rods stuck.	B.1	Be in MODE 3.	12 hours
C. One or more control rods inoperable for reasons other than Condition A or B.	C.1	--------NOTE-------- RWM may be bypassed as allowed by LCO 3.3.2.1, if required, to allow insertion of inoperable control rod and continued operation. ----------	
		Fully insert inoperable control rod.	3 hours
	AND		
	C.2	Disarm the associated CRD.	4 hours

(continued)

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.1.3.1	Determine the position of each control rod.	24 hours
SR 3.1.3.2 (Deleted)	----------NOTE---------- Not required to be performed until 7 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of RWM. ---------- Insert each fully withdrawn control rod at least one notch.	7 days
SR 3.1.3.3	----------NOTE---------- Not required to be performed until 31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM. ---------- Insert each partially withdrawn control rod at least one notch.	31 days
SR 3.1.3.4	Verify each control rod scram time from fully withdrawn to notch position 06 is $\leq$ 7 seconds.	In accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4

(continued)

Attachment 3

Proposed Technical Specification Revisions
(Final Typed)

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

Technical Specification Pages

1.4-4
1.4-5
3.1-8
3.1-10

EXAMPLES

EXAMPLE 1.4-2 (continued)

"Thereafter" indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the "once" performance in this example). If reactor power decreases to < 25% RTP, the measurement of both intervals stops. New intervals start upon reactor power reaching 25% RTP.

EXAMPLE 1.4-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
----------NOTE---------- Not required to be performed until 12 hours after ≥ 25% RTP. ----------	
Perform channel adjustment.	7 days

The interval continues whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required performance of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be within the "specified Frequency." Therefore, if the Surveillance were not performed within the 7 day interval (plus the extension allowed by SR 3.0.2), but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours (plus the extension allowed by SR 3.0.2) with power ≥ 25% RTP.

(continued)

EXAMPLES

EXAMPLE 1.4-3 (continued)

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval (plus the extension allowed by SR 3.0.2), there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

EXAMPLE 1.4-4

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
----------NOTE---------- Only required to be met in MODE 1. ----------	
Verify leakage rates are within limits.	24 hours

Example 1.4-4 specifies that the requirements of this Surveillance do not have to be met until the unit is in MODE 1. The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an "otherwise stated" exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), but the unit was not in MODE 1, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES, even with the 24 hour Frequency exceeded, provided the MODE change was not made into MODE 1. Prior to entering MODE 1 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.3	Perform SR 3.1.3.3 for each withdrawn OPERABLE control rod.	24 hours from discovery of Condition A concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM.
	AND		
	A.4	Perform SR 3.1.1.1.	72 hours
B. Two or more withdrawn control rods stuck.	B.1	Be in MODE 3.	12 hours
C. One or more control rods inoperable for reasons other than Condition A or B.	C.1	----------NOTE---------- RWM may be bypassed as allowed by LCO 3.3.2.1, if required, to allow insertion of inoperable control rod and continued operation. ----------	
		Fully insert inoperable control rod.	3 hours
	AND		
	C.2	Disarm the associated CRD.	4 hours

(continued)

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.1.3.1	Determine the position of each control rod.	24 hours
SR 3.1.3.2	(Deleted)	
SR 3.1.3.3	----------NOTE---------- Not required to be performed until 31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM. ---------- Insert each withdrawn control rod at least one notch.	31 days
SR 3.1.3.4	Verify each control rod scram time from fully withdrawn to notch position 06 is $\leq$ 7 seconds.	In accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4

(continued)

Attachment 4

Regulatory Commitments

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

The following table identifies those actions committed to by Nebraska Public Power District in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to David Van Der Kamp, Licensing Manager.

REGULATORY COMMITMENT	DUE DATE
Nebraska Public Power District will establish the Technical Specification Bases changes for TS B 3.1.3 consistent with those shown in TSTF-475-A, Revision 1, "Control Rod Notch Testing Frequency and SRM Insert Control Rod Action", with the variations noted.	Implementation of License Amendment

Attachment 5

Proposed Technical Specification Bases Changes

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

Technical Specification Bases Pages

B 3.1-15
B 3.1-16
B 3.1-19
B 3.1-20

NO CHANGE
PROVIDED FOR INFORMATION ONLY
[IDENTIFIES WHERE CONTINUED ACTIONS (ON NEXT PAGE) ORIGINATE]

BASES

APPLICABILITY

In MODES 1 and 2, the control rods are assumed to function during a DBA or transient and are therefore required to be OPERABLE in these MODES. In MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate requirements for control rod OPERABILITY during these conditions. Control rod requirements in MODE 5 are located in LCO 3.9.5, "Control Rod OPERABILITY - Refueling."

ACTIONS

The ACTIONS Table is modified by a Note indicating that a separate Condition entry is allowed for each control rod. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable control rod. Complying with the Required Actions may allow for continued operation, and subsequent inoperable control rods are governed by subsequent Condition entry and application of associated Required Actions.

A.1, A.2, A.3, and A.4

A control rod is considered stuck if it will not insert by either CRD drive water or scram pressure. With a fully inserted control rod stuck, no actions are required as long as the control rod remains fully inserted. The Required Actions are modified by a Note, which allows the rod worth minimizer (RWM) to be bypassed if required to allow continued operation. LCO 3.3.2.1, "Control Rod Block Instrumentation," provides additional requirements when the RWM is bypassed to ensure compliance with the CRDA analysis. With one withdrawn control rod stuck, the local scram reactivity rate assumptions may not be met if the stuck control rod separation criteria are not met. Therefore, a verification that the separation criteria are met must be performed immediately. The separation criteria are not met if a) the stuck control rod occupies a location adjacent to two "slow" control rods, b) the stuck control rod occupies a location adjacent to one "slow" control rod, and the one "slow" control rod is also adjacent to another "slow" control rod; or c) if the stuck control rod occupies a location adjacent to one "slow" control rod when there is another pair of "slow" control rods adjacent to one another.

(continued)

BASES

ACTIONS

A.1, A.2, A.3, and A.4 (continued)

The description of "slow" control rods is provided in LCO 3.1.4, "Control Rod Scram Times." In addition, the associated control rod drive must be disarmed (hydraulically) in 2 hours. The allowed Completion Time of 2 hours is acceptable, considering the reactor can still be shut down, assuming no additional control rods fail to insert, and provides a reasonable time to perform the Required Action in an orderly manner. The control rod must be isolated from both scram and normal insert and withdraw pressure. Isolating the control rod from scram and normal insert and withdraw pressure prevents damage to the CRDM. The control rod should be isolated from scram and normal insert and withdraw pressure, while maintaining cooling water to the CRD.

Monitoring of the insertion capability of each withdrawn control rod must also be performed within 24 hours from discovery of Condition A concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM. ~~SR 3.1.3.2 and~~ SR 3.1.3.3 performs periodic tests of the control rod insertion capability of withdrawn control rods. Testing each withdrawn control rod ensures that a generic problem does not exist. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock". The Required Action A.3 Completion Time only begins upon discovery of Condition A concurrent with THERMAL POWER greater than the actual LPSP of the RWM since the notch insertions may not be compatible with the requirements of rod pattern control (LCO 3.1.6) and the RWM (LCO 3.3.2.1). The allowed Completion Time provides a reasonable time to test the control rods, considering the potential for a need to reduce power to perform the tests.

To allow continued operation with a withdrawn control rod stuck, an evaluation of adequate SDM is also required within 72 hours. Should a DBA or transient require a shutdown, to preserve the single failure criterion, an additional control rod would have to be assumed to fail to insert when required. Therefore, the original SDM demonstration may not be valid. The SDM must therefore be evaluated (by measurement or analysis) with the stuck control rod at its stuck position and the highest worth OPERABLE control rod assumed to be fully withdrawn.

(continued)

BASES

ACTIONS

E.1 (continued)

active function (i.e., scram) of the control rods. The number of control rods permitted to be inoperable when operating above 10% RTP (e.g., no CRDA considerations) could be more than the value specified, but the occurrence of a large number of inoperable control rods could be indicative of a generic problem, and investigation and resolution of the potential problem should be undertaken. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.3.1

The position of each control rod must be determined to ensure adequate information on control rod position is available to the operator for determining control rod OPERABILITY and controlling rod patterns. Control rod position may be determined by the use of OPERABLE position indicators, by moving control rods to a position with an OPERABLE indicator, or by the use of other appropriate methods. The 24 hour Frequency of this SR is based on operating experience related to expected changes in control rod position and the availability of control rod position indications in the control room.

SR 3.1.3.2 (Deleted)

~~SR 3.1.3.2 and~~ SR 3.1.3.3

Control rod insertion capability is demonstrated by inserting each partially or fully withdrawn control rod at least one notch and observing that the control rod moves. The control rod may then be returned to its original position. This ensures the control rod is not stuck and is free to insert on a scram signal. This Surveillance ~~are~~ is not required when THERMAL POWER is less than or equal to the actual LPSP of the RWM, since the notch insertions may not be compatible with the requirements of the Banked Position Withdrawal Sequence (BPWS) (LCO 3.1.6) and the RWM (LCO 3.3.2.1). The 7 day Frequency of SR 3.1.3.2 is based on operating experience related to the changes in CRD performance and the ease of performing notch testing for fully withdrawn control rods. Partially withdrawn control

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR ~~3.1.3.2 and~~ SR 3.1.3.3 (continued)

rods are tested at a 31 day Frequency, based on the potential power reduction required to allow the control rod movement and considering the large testing sample of ~~SR 3.1.3.2.~~ Furthermore, the 31 day Frequency takes into account operating experience related to changes in CRD performance. At any time, if a control rod is immovable, a determination of that control rod's capability of insertion by scram (OPERABILITY) must be made and appropriate action taken.

~~The~~ SR~~s~~ ~~are~~ modified by a Note~~s~~ that allow~~s~~ ~~7 days and~~ 31 days ~~respectively,~~ after withdrawal of the control rod and increasing power to above the LPSP, to perform the Surveillance. This acknowledges that the control rod must be first withdrawn and THERMAL POWER must be increased to above the LPSP before performance of the Surveillance, and therefore the Notes avoid potential conflicts with SR 3.0.3 and SR 3.0.4.

SR 3.1.3.4

Verifying that the scram time for each control rod to notch position 06 is $\leq$ 7 seconds provides reasonable assurance that the control rod will insert when required during a DBA or transient, thereby completing its shutdown function. This SR is performed in conjunction with the control rod scram time testing of SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4. The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," and the functional testing of SDV vent and drain valves in LCO 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," overlap this Surveillance to provide complete testing of the assumed safety function. The associated Frequencies are acceptable, considering the more frequent testing performed to demonstrate other aspects of control rod OPERABILITY and operating experience, which shows scram times do not significantly change over an operating cycle.

(continued)

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©[4]

Correspondence Number: NLS2009034

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 will establish the Technical Specification Bases changes for TS B3.1.3 consistent with those shown in TSTF-475-A, Revision 1, "Control Rod Notch Testing Frequency and SRM Insert Control Rod Action", with the variations noted.	NLS2009034-01	Implementation of License Amendment