June 11, 2009

LICENSEE: Nebraska Public Power District

FACILITY: Cooper Nuclear Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON MAY 27, 2009, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND NEBRASKA PUBLIC POWER DISTRICT, RELATED TO A CLARIFICATION ON CERTAIN REQUESTS FOR ADDITIONAL INFORMATION (RAI 3.3.2.2.3.3-1, RAI 3.3.2.2.7.3-1, RAI 3.3.2.2.7.3-2), FOR COOPER NUCLEAR STATION LICENSE RENEWAL

The U.S. Nuclear Regulatory Commission staff and representatives of Nebraska Public Power District held a telephone conference call on May 27, 2009, to discuss clarifications for certain draft requests for additional information for Cooper Nuclear Station license renewal.

Enclosure 1 provides a listing of the participants, and Enclosure 2 contains a brief description of the telephone conference call.

The applicant had an opportunity to comment on this summary.

/RA/

Tam Tran, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosures:
As stated

cc w/encls: See next page

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DATE	06/11/09	06/10/09	6/10/09	6/11/09

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Memorandum to Nebraska Public Power District from Tam Tran dated June 11, 2009

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON MAY 27, 2009, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND NEBRASKA PUBLIC POWER DISTRICT, RELATED TO A CLARIFICATION ON CERTAIN REQUESTS FOR ADDITIONAL INFORMATION (RAI 3.3.2.2.3.3-1, RAI 3.3.2.2.7.3-1, RAI 3.3.2.2.7.3-2), FOR COOPER NUCLEAR STATION LICENSE RENEWAL

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Cooper Nuclear Station

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TELEPHONE CONFERENCE CALL
COOPER NUCLEAR STATION
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
May 27, 2009

PARTICIPANTS	AFFILIATIONS
Tam Tran	U.S. Nuclear Regulatory Commission (NRC)
Robert Sun	NRC
Dave Bremer	Nebraska Public Power District (NPPD)
Jim Loynes	NPPD
Scott Freborg	NPPD
Dave Lach	Entergy
Alan Cox	Entergy
Don Fronabarger	Entergy
Andrew Taylor	Entergy

ENCLOSURE 1

TELEPHONE CONFERENCE CALL
COOPER NUCLEAR STATION
LICENSE RENEWAL APPLICATION

BRIEF DESCRIPTION
May 27, 2009

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Nebraska Public Power District held a telephone conference call on May 27, 2009, to discuss clarifications for certain draft requests for additional information listed below.

Discussion:

RAI 3.3.2.2.3.3-1 (Draft)

Background:

Section 3.3.2.2.3.3 "Cracking due to Stress Corrosion Cracking (SCC)" of the SRP-LR identifies SCC as an aging effect requiring management for stainless steel diesel engine exhaust piping, piping components, and piping elements exposed to diesel exhaust. The GALL report identifies this MEAP combination in item VII.H2-1. AMR item AP-33 in Table II.A of NUREG-1833, "Technical Bases for Revision to the License Renewal Guidance Documents," provides a basis for why it is important to identify SCC as an AERM for the internal surfaces of stainless steel emergency diesel generator exhaust piping that are exposed to diesel exhaust. Specifically, NUREG-1833 states that hot diesel engine exhaust may contain moisture and particulates which lead to SCC in stainless steel diesel exhaust components.

Issue:

Contrary to the License Renewal Guidance identified above, the applicant states that stainless steel exhaust components are not subject to significant moisture accumulation that would allow cracking to occur. The staff disagrees with this approach, and takes the position that this must be identified as an AERM similar to the GALL item VII.H2-1.

Request:

Please provide an AMP and AMR line item to manage the aging effect recommended by GALL VII.H2-1.

The applicant indicated understanding of this request for information and that similar items have been communicated to other applicant(s) previously, in earlier application(s) for other plant(s).

RAI 3.3.2.2.7.3-1 (Draft)

Background:

Section 3.3.2.2.7.3, “Loss of Material due to General, Pitting, and Crevice Corrosion” of the SRP-LR identifies loss of material as an aging effect requiring management for steel and stainless steel diesel exhaust piping, piping components, and piping elements exposed to diesel exhaust. The applicant has credited the plant specific AMP, B.1.31, Periodic Surveillance and Preventive Maintenance (PSPM) Program with managing this aging effect for emergency diesel generator exhaust piping, piping components, and piping elements.

Issue:

The PSPM Program identifies the use of visual inspections performed on a “representative sample” of diesel generator exhaust gas components to manage the loss of material aging effect. The AMP indicates that sample size is determined using guidance from EPRI TR-107514, Age-Related Degradation Inspection Method and Demonstration, for a 90% confidence level that 90% of the population does not experience degradation. However, it is not clear what the population and sample size will be for the diesel generator system exhaust components. Additionally, the AMP indicates that “components with the same material-environment combinations at other facilities may be included in the sample.” The inspection of components at other facilities would not necessarily offer an accurate representation of the aging effects at the current facility, and thus brings into question the extent of which this method will be used and the effect of its inclusion on the overall population and sample size.

Request:

a) Please provide the total actual population and sample size of diesel generator exhaust gas components to manage the loss of material aging effect at Cooper Nuclear Station.
b) Please clarify the use of “inspection of components at other facilities” as part of the representative sample for diesel generator exhaust gas components to manage the loss of material aging effect at Cooper Nuclear Station, and identify the specific impact this will have on the overall population and sample size.

The applicant indicated understanding of this request for information.

RAI 3.3.2.2.7.3-2 (Draft)

Background:

Section 3.3.2.2.7.3, “Loss of Material due to General, Pitting, and Crevice Corrosion” of the SRP-LR identifies loss of material as an aging effect requiring management for steel and stainless steel diesel exhaust piping, piping components, and piping elements exposed to diesel exhaust. The applicant has credited the plant specific AMP, B.1.16, Fire Protection Program with managing this aging effect for the diesel fire pump engine exhaust piping, piping components, and piping elements.

Issue:

LRA AMP, B.1.16, Fire Protection Program states as an enhancement that the diesel fire pump engine carbon steel exhaust components are inspected for evidence of corrosion or cracking. However, the LRA is not clear whether the inspection will be an internal inspection or external only. An internal inspection is necessary to inspect for the aging effects caused by exhaust gas.

Request:

Please clarify whether the inspection conducted by the Fire Protection Program includes the internal surface of the components.

The applicant indicated understanding of this request for information.