

April 13, 2010

Mr. Stewart B. Minahan
Chief Nuclear Officer, Vice President - Nuclear
Cooper Nuclear Station
Nebraska Public Power District
72676 648A Ave
Brownville, NE 68321

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
COOPER NUCLEAR STATION LICENSE RENEWAL APPLICATION (TAC NO.
MD9763)

Dear Mr. Minahan:

By letter dated September 24, 2008, Nebraska Public Power District submitted an application pursuant to Title of the *Code of Federal Regulation* 10 CFR Part 54, to renew the operating license, DPR-46, for Cooper Nuclear Station for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and the associated Environmental Report submitted. The staff has identified, in the enclosure, an area where additional information is needed to complete the review.

The request for additional information (RAI) B.1.3-3 in the enclosure, was discussed with Mr. David Bremer on March 25, 2010. A mutually agreeable date for the response is within 30 days from the date of this letter, in order to maintain the license renewal review schedule. If you have any questions, please contact Bennett Brady at 301-415-2981 or by e-mail at bennett.brady@nrc.gov or Tam Tran at 301-415-3617 or by e-mail at tam.tran@nrc.gov.

Sincerely,

/RA/

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

Docket No. 50-298

cc w/encl: See next page

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Sincerely,

/RA/

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

Docket No. 50-298

Enclosure:

Docket No. 50-298

DISTRIBUTION: See next page

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OFFICE	LA:DLR	PM:DLR:RPB1	PM:DLR:RPB1	BC:DLR:RPB1
NAME	IKing	BBrady	TTran	B. Pham
DATE	4/08/10	4/13/10	4/08/10	4/13/10

OFFICIAL RECORD COPY

Letter to S. Minahan from T. Tran dated, April 13, 2010

DISTRIBUTION:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
COOPER NUCLEAR STATION LICENSE RENEWAL APPLICATION (TAC NO.
MD9763 AND MD9737)

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T. Tran
B. Brady
F. Lyon
I. Couret, OPA
D. Roth, OGC
A. Jones, OGC
N. Taylor, RIV
V. Dricks, RIV
D. Chamberlain, RIV
A. Vogel, RIV
W. Walker, RIV
G. Miller, RIV
G. Pick, RIV

Cooper Nuclear Station

cc:

Mr. Ronald D. Asche
President and Chief Executive Officer
Nebraska Public Power District
1414 15th Street
Columbus, NE 68601

Mr. Gene Mace
Nuclear Asset Manager
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

Mr. John C. McClure
Vice President and General Counsel
Nebraska Public Power District
P.O. Box 499
Columbus, NE 68602-0499

Mr. David Van Der Kamp
Licensing Manager
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

Mr. Michael J. Linder, Director
Nebraska Department of Environmental
Quality
P.O. Box 98922
Lincoln, NE 68509-8922

Chairman
Nemaha County Board of Commissioners
Nemaha County Courthouse
1824 N Street
Auburn, NE 68305

Ms. Julia Schmitt, Manager
Radiation Control Program
Nebraska Health & Human Services R&L
Public Health Assurance
301 Centennial Mall, South
P.O. Box 95007
Lincoln, NE 68509-5007

Deputy Director for Policy
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 218
Brownville, NE 68321

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

Director, Missouri State Emergency
Management Agency
P.O. Box 116
Jefferson City, MO 65102-0116

Chief, Radiation and Asbestos
Control Section
Kansas Department of Health
and Environment
Bureau of Air and Radiation
1000 SW Jackson, Suite 310
Topeka, KS 66612-1366

Ms. Melanie Rasmussen
Radiation Control Program Director
Bureau of Radiological Health
Iowa Department of Public Health
Lucas State Office Building, 5th Floor
321 East 12th Street
Des Moines, IA 50319

Mr. Keith G. Henke, Planner
Division of Community and Public Health
Office of Emergency Coordination
930 Wildwood Drive
P.O. Box 570
Jefferson City, MO 65102

Cooper Nuclear Station

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cc:

Mr. Art Zaremba, Director of Nuclear
Safety Assurance
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

Mr. John F. McCann, Director
Licensing, Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601-1813

Mr. Mike Boyce
Cooper Strategic Initiatives Manager
Cooper Nuclear Station
72676 – 648A Avenue
Brownville, NE 68321

Mr. Dave Bremer
License Renewal Project Manager
Cooper Nuclear Station
72676 – 648A Avenue
Brownville, NE 68321

Mr. Bill Victor
License Renewal Project Licensing Lead
Cooper Nuclear Station
72676 – 648A Avenue
Brownville, NE 68321

Mr. Garry Young
License Renewal Manager
Entergy Nuclear
1448 S.R. 333, N-GSB-45
Russellville, AR 72802

Mr. Alan Cox
License Renewal Technical Manager
Entergy Nuclear
1448 S.R. 333, N-GSB-45
Russellville, AR 72802

Mr. Dave Lach
LRP Entergy Project Manager
Entergy Nuclear
1448 S.R. 333, N-GSB-45
Russellville, AR 72802

REQUEST FOR ADDITIONAL INFORMATION
REGARDING THE COOPER NUCLEAR STATION
LICENSE RENEWAL APPLICATION

RAI B.1.3-3

Background

The license renewal application (LRA) states that Aging Management Program (AMP) B.1.3, Buried Piping and Tanks Inspection Program, is a new program with no exceptions or enhancements and is consistent with the program elements in GALL AMP XI.M34. This AMP addresses buried piping, i.e., piping in direct contact with soil. The description of the operating experience (OE) attribute for this AMP does not discuss specific OE at CNS or from the industry. Instead, it states that “plant operating experience for this program will be gained as it is implemented during the period of extended operations, and will be factored into the program via the confirmation and corrective action elements of the CNS 10 CFR 50 Appendix B quality assurance program.”

The LRA also states that AMP B.1.14, External Surfaces Monitoring Program, is an existing program with enhancement. This AMP is also credited for managing the aging of the external surfaces of piping exposed to air.

Issue

There have been a number of recent industry events involving leakage from buried and underground piping, where the causes have included coating damage during backfill of piping, failure of fiberglass piping, failure of buried piping in and around piping penetrations, and failure of piping in trenches. In light of this recent industry OE, the staff is concerned about the susceptibility of buried and/or underground piping that are within the scope of 10 CFR 54.4 and subject to aging management for license renewal. In reviewing the AMPs cited above, along with the applicable aging management review (AMR) items associated with them, the staff is not clear whether the components addressed by these AMPs would include both buried and underground piping (piping which is below grade and contained in a vault or other structure where it is exposed to air and where access is limited), and also if such programs would be sufficient and effective in managing the aging effects of buried and underground piping.

Request

Please provide the staff information regarding how NPPD will incorporate the recent industry OE into its aging management reviews and programs in order to adequately and effectively manage the effects of aging, specifically for systems and components that are in scope for license renewal and include buried and underground piping.

ENCLOSURE