

June 16, 2010

LICENSEE: Nebraska Public Power District
FACILITY: Cooper Nuclear Station
SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON
MAY 18, 2010, BETWEEN THE U.S. NUCLEAR REGULATORY
COMMISSION STAFF AND NEBRASKA PUBLIC POWER DISTRICT,
RELATED TO A CLARIFICATION FOR CERTAIN RESPONSES TO
REQUESTS FOR ADDITIONAL INFORMATION, 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 18, 2010, to discuss clarifications for certain responses to 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 conference call.

The applicant had an opportunity to comment on this summary.

/RA/

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

Docket No. 50-298

Enclosures:
As stated

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DATE	6/07/10	6/07/10	6/14/10	6/14/10	6/16/10

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Memorandum to Nebraska Public Power District from T. Tran dated June 16, 2010

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TELEPHONE CONFERENCE CALL FOR
COOPER NUCLEAR STATION
LICENSE RENEWAL APPLICATION

May 18, 2010

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COOPER NUCLEAR STATION
LICENSE RENEWAL APPLICATION
(Brief description of the conference call)

The U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Nebraska Public Power District (NPPD) held a telephone conference call on May 18, 2010, to discuss clarifications for a certain open item in the Safety Evaluation Report (SER) with Open Items for Cooper Nuclear Station (CNS) license renewal.

Clarification for RAI B.1.3-3 Response

The staff reviewed the response to request for additional information (RAI) B.1.3-3, dated May 4, 2010. The staff has the following clarification questions:

1. To what extent has buried piping that is in the scope of license renewal been protected by the existing cathodic protection system? If there are different levels of protection between systems, please be prepared to discuss the degree of protection for each unique system.
2. In the existing RAI response (RAI B.1.3-3 and NLS2010050/ML101310605), the applicant committed to visually inspect at a minimum a buried location in the service water, fire protection, and condensate make-up systems. If the applicant inspects only these three locations, what percentage of linear feet of all in scope buried pipes does this represent (to ensure representative sampling of interest)?
3. In the RAI B.1.3-3 response, the applicant discussed upgrading CNS cathodic protection system. Did you intend to commit to this action (if this is a future action vs. an ongoing action and status)?
4. Is there any needed RAI response supplement/follow-up RAI being planned?

The applicant provided the following clarifications:

1. There are 8 in-scope systems: (1) service water (SW), (2) condensate makeup (CM), (3) fire protection (FP), (4) off gas (OG) included as Plant Drains, (5) High Pressure Coolant Injection (HPCI), (6) diesel fuel oil (DGDO), (7) standby gas treatment (SGT), (8) nitrogen (N₂). There are currently five impressed current cathodic protection systems installed at CNS. Two of the systems (protecting in-scope systems: SW, CM, FP, OG, and SGT) are located on the east side of the facility and were installed in 1973 to mitigate soil side corrosion of buried piping in the main plant area. Two additional cathodic protection systems (in-scope system: FP) were added in 1983 to provide protection to the interior submerged surfaces of two fire water storage tanks. An additional impressed applied current system (in-scope system: FP) was installed with a new warehouse facility in 1990 to provide protection to fire water piping for that facility.

A cathodic protection survey performed at CNS identified areas (in-scope system: DGDO) where the structure-to-oil potential measurement did not satisfy the -850 mv criteria established by NACE. In response to the survey, an upgrade of the cathodic protection system is currently in progress at CNS. Modifications include installation of four new distributed ground beds and 13 cathodic protection test stations.

ENCLOSURE 2

2. As discussed in the RAI response, NPPD plans to perform opportunistic inspections of buried piping (in-scope systems: SW, FP, and CM) during modifications to the cathodic protection (CP) system. Exposed coating will be visually inspected for degradation before being removed, and ultrasonic wall thickness (UT) measurements will be taken at these locations with the coating removed. The examination of the piping beneath the coating provides confirmation of the effectiveness of the coating in preventing aging effects. This removal of the coating and UT is above and beyond what would typically be done during inspections under the current GALL program. NPPD will choose the most opportunistic point on one end of the line to connect the rectifier feed and the most opportunistic location on the opposite end of the line for the test station. This separation of the inspection locations provides assurance that the inspection results will provide a good indication of the state of buried pipe coatings at the CNS site.

Although these inspections will cover less than one percent of total linear feet of all in scope buried pipe, the applicant believes these are representative and valid inspections that will provide evidence of the condition of the coatings on the system piping. If degradation of the coating exists, the inspections described in the paragraph above should be able to detect it. These inspections will cover a substantial cross-section of buried piping that is representative of large segments of the in-scope buried piping since the piping has similar soil conditions, coating materials, and cathodic protection coverage.

The applicant believes that implementation of the inspection plan by June 2012 in addition to the existing inspections described above in (1) prior to the period of extended operation (PEO) are sufficient to ensure that an effective representative sampling of buried piping will be inspected in a manner that ensures that the integrity of the piping is maintained.

3. The CP System upgrade was referenced in NPPD's response to RAI B.1.3-3 (SER Open Item 3.0.3.2-1) per NLS2010050. Efforts are underway to perform this work. While CNS fully intends to complete the CP system upgrades by August 2010, the applicant believes its program effectiveness (AMP described in LRA B.1.3 is a new program) does not rely on completion of the upgrade because of the CP reasoning listed below. Therefore, it was deemed unnecessary to make a formal commitment to complete the upgrades.

The condition of the CP is a factor that enters into establishing the priority and frequency of inspections through the risk ranking process. The CP upgrade effort has completed installation of a CP loop for a portion of the buried fire protection water system piping. During the installation, visual examinations of the exposed buried fire protection water piping revealed the piping segments in excellent condition with intact coating.

4. There is no anticipated RAI response supplement/follow-up RAI at this time.

The staff and the applicant were in agreement on two items of mutual interests: (1) assurance of representative sampling of interest and (2) CP upgrade and inspection work are ongoing; some will be completed by 2012 and some will continue to be completed during the PEO. The staff

agreed to provide a reviewing decision on the RAI B.1.3-3 response in the next conference call after the staff's review of the response.

Cooper Nuclear Station

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