



Nebraska Public Power District

Always there when you need us

54.21(b)

NLS2010100
November 15, 2010

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

Subject: Revision to License Renewal Commitment
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Reference: Letter from Stewart B. Minahan, Nebraska Public Power District, to U.S. Nuclear
Regulatory Commission, dated September 24, 2008, "License Renewal
Application" (NLS2008071)

Dear Sir or Madam:

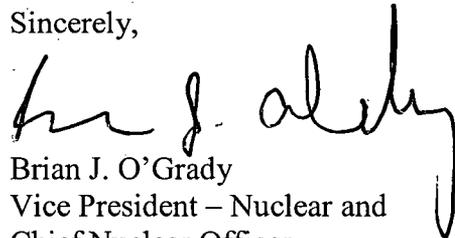
The purpose of this letter is for the Nebraska Public Power District to provide a revised Cooper Nuclear Station (CNS) License Renewal commitment. In a conference call conducted on November 10, 2010, the Nuclear Regulatory Commission (NRC) requested that an additional commitment be made regarding the Fatigue Monitoring Program described in the referenced License Renewal Application (LRA). This commitment is reflected in the attached LRA changes as a revision to Commitment Number NLS2008071-08.

Should you have any questions regarding this submittal, please contact David Bremer, License Renewal Project Manager, at (402) 825-5673.

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

Executed on 11/15/2010
(Date)

Sincerely,



Brian J. O'Grady
Vice President – Nuclear and
Chief Nuclear Officer

/wv

A136
WRP

Attachment

cc: Regional Administrator w/Attachment
USNRC - Region IV

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

Senior Resident Inspector w/Attachment.
USNRC - CNS

Nebraska Health and Human Services w/Attachment
Department of Regulation and Licensure

NPG Distribution w/Attachment

CNS Records w/Attachment

Attachment

Revision to License Renewal Commitment
Cooper Nuclear Station, Docket No. 50-298, DPR-46

In a conference call conducted on November 10, 2010, the Nuclear Regulatory Commission (NRC) requested a commitment to ensure that the most limiting location was evaluated to assess the affects of the reactor coolant environment on component metal fatigue. NPPD has provided that commitment below in a revision to Commitment NLS2008071-08, Revision 2. The changes are presented in underline/strikeout format.¹

1. LRA Section A.1.1.15 is revised to read:

“The Fatigue Monitoring Program will be enhanced as follows:

- Consideration of the effect of the reactor water environment will be accomplished through implementation of one or more of the following options for the reactor vessel shell and lower head, feedwater nozzles, core spray nozzles and RHR pipe transition. In addition, NPPD will review design basis ASME Class 1 component fatigue evaluations to determine whether the CNS locations that have been evaluated for the effects of the reactor coolant environment on fatigue include the limiting component within the reactor coolant pressure boundary. If a more limiting component is identified, NPPD will determine the effects of the reactor coolant environment on its fatigue usage in accordance with the following.

(1) Update the fatigue usage calculations using refined fatigue analyses to determine valid CUFs less than 1.0 when accounting for the effects of reactor water environment. This includes applying the appropriate F_{en} factors to valid CUFs determined using an NRC-approved version of the ASME code or NRC-approved alternative (e.g., NRC-approved code case). NPPD will use NUREG/CR-6909 when determining the effects of the reactor coolant environment on the fatigue life of Alloy 600 or other nickel alloy components.

(2) Repair or replace the affected locations before exceeding a CUF of 1.0.

- The CNS Fatigue Monitoring Program will be enhanced to require the recording of each transient associated with the actuation of a safety/relief valve (SRV).

Enhancements will be implemented at least two years prior to entering the period of extended operation.”

¹ The changes shown are made against Revision 2 of this commitment submitted in NLS2010044 on April 28, 2010 (ADAMS Accession Number ML101250530).

Basis for change: Change requested in a conference call with the NRC Staff on November 10, 2010.

2. LRA Section B.1.15 is revised to read²:

Elements Affected	Enhancement
2. Preventive Actions 4. Detection of Aging Effects 6. Acceptance Criteria 7. Corrective Actions	<p>Consideration of the effect of the reactor water environment will be accomplished through implementation of one or more of the following options for the reactor vessel shell and lower head, feedwater nozzles, core spray nozzles and RHR pipe transition. <u>In addition, NPPD will review design basis ASME Class 1 component fatigue evaluations to determine whether the CNS locations that have been evaluated for the effects of the reactor coolant environment on fatigue include the limiting component within the reactor coolant pressure boundary. If a more limiting component is identified, NPPD will determine the effects of the reactor coolant environment on its fatigue usage in accordance with the following.</u></p> <p>(1) Update the fatigue usage calculations using refined fatigue analyses to determine valid CUFs less than 1.0 when accounting for the effects of reactor water environment. This includes applying the appropriate F_{en} factors to valid CUFs determined using an NRC-approved version of the ASME code or NRC-approved alternative (e.g., NRC-approved code case). NPPD will use NUREG/CR-6909 when determining the effects of the reactor coolant environment on the fatigue life of Alloy 600 <u>or other nickel alloy components.</u></p> <p>(2) Repair or replace the affected locations before exceeding a CUF of 1.0.</p>

Basis for change: Change requested in a conference call with the NRC Staff on November 10, 2010.

² The changes shown are made against Revision 2 of this commitment submitted in NLS2010044 on April 28, 2010 (ADAMS Accession Number ML101250530).

Correspondence Number: NLS2010100

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
<p>Consideration of the effect of the reactor water environment will be accomplished through implementation of one or more of the following options for the reactor vessel shell and lower head, feedwater nozzles, core spray nozzles and RHR pipe transition. In addition, NPPD will review design basis ASME Class 1 component fatigue evaluations to determine whether the CNS locations that have been evaluated for the effects of the reactor coolant environment on fatigue include the limiting component within the reactor coolant pressure boundary. If a more limiting component is identified, NPPD will determine the effects of the reactor coolant environment on its fatigue usage in accordance with the following.</p> <p>(1) Update the fatigue usage calculations using refined fatigue analyses to determine valid CUFs less than 1.0 when accounting for the effects of reactor water environment. This includes applying the appropriate F_{en} factors to valid CUFs determined using an NRC-approved version of the ASME code or NRC-approved alternative (e.g., NRC-approved code case). NPPD will use NUREG/CR-6909 when determining the effects of the reactor coolant environment on the fatigue life of Alloy 600 or other nickel alloy components.</p> <p>(2) Repair or replace the affected locations before exceeding a CUF of 1.0.</p> <p>The CNS Fatigue Monitoring Program will be enhanced to require the recording of each transient associated with the actuation of a safety/relief valve (SRV).</p>	<p>NLS2008071-08 (Revision 3)</p>	<p>January 18, 2012</p>