



**Nebraska Public Power District**  
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10 CFR 50.54(f)

NLS2011052  
June 10, 2011

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Subject: 30-Day Response to NRC Bulletin 2011-01, Mitigating Strategies  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Reference: NRC Bulletin 2011-01: Mitigating Strategies, dated May 11, 2011

Dear Sir or Madam:

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued the referenced Bulletin 2011-01, and requested a written response within 30 days. Attached is Nebraska Public Power District's (NPPD) 30-day response for Cooper Nuclear Station (CNS).

In response to the events on September 11, 2001, and NRC requirements, NPPD developed preplanned strategies and implemented guidance to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities under the circumstances associated with the loss of large areas of the plant due to fire or explosions. Following the events on March 11, 2011, at the Fukushima Daiichi Nuclear Power Station, NPPD took actions to ensure availability of these capabilities. The attached response reflects these actions.

There are no new commitments contained in this submittal.

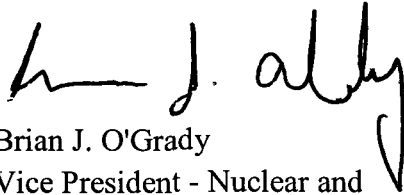
If you need any additional information, please contact David Van Der Kamp, Licensing Manager, at (402) 825-2904.

A146  
NPPD

I declare under penalty of perjury that the contents of this response are true and correct.

Executed On: June 10, 2011  
(Date)

Sincerely,

A handwritten signature in black ink, appearing to read "Brian J. O'Grady". The signature is fluid and cursive, with the first name "Brian" and last name "O'Grady" clearly distinguishable.

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

/lb

Attachment

cc: Regional Administrator w/attachment  
USNRC - Region IV

CNS Project Manager w/attachment  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/attachment  
USNRC - CNS

NPG Distribution w/o attachment

CNS Records

30-Day Response to NRC Bulletin 2011-01  
Cooper Nuclear Station

Question 1

*Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?*

Response:

The mitigating strategies required by Section B.5.b of the Interim Compensatory Measures Order EA-02-026 and the radiological protection mitigation strategies required by Order EA-06-137 were implemented pursuant to license conditions. The strategies were submitted to the NRC by References 1 through 7 and reviewed and approved by the NRC in Reference 8. In addition, one strategy was subsequently amended per Reference 9.

NPPD assessed the status of equipment necessary to execute the mitigating strategies as identified in the referenced letters. Based upon the assessment, the equipment is available and capable of performing its intended function.

Question 2

*Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?*

Response:

NPPD assessed the capability to execute the mitigating strategies as identified in the referenced letters. Based upon the assessment, the guidance and strategies are capable of being executed considering the current configuration of the facility, staffing, and skill levels of the staff.

References

1. Letter NLS2005052 from Randall K. Edington, NPPD, to USNRC dated May 26, 2005, Response to NRC Guidance Regarding Mitigation Strategies
2. Letter NLS2005104 from Stewart B. Minahan, NPPD, to USNRC dated November 7, 2005, Response to Request for Additional Information Regarding the February 2002 Order Section B.5.b for Cooper Nuclear Station
3. Letter NLS2006023 from Stewart B. Minahan, NPPD, to USNRC dated February 27, 2006, Response to Report of Inspection of Nuclear Reactor Safeguards Interim Compensatory Measures - Section B.5.b, Temporary Instruction 2515/164; NRC Inspection Report 05000298/2005013

4. Letter NLS2006036 from Randall K. Edington, NPPD, to USNRC dated May 4, 2006, Supplemental Response to Report of Inspection of Nuclear Reactor Safeguards Interim Compensatory Measures - Section B.5.b, Temporary Instruction 2515/164; NRC Inspection Report 05000298/2005013
5. Letter NLS2006077 from Randall K. Edington, NPPD, to USNRC dated October 16, 2006, 120-Day Response to NRC June 20, 2006, Order Requiring Compliance with Key Radiological Protection Mitigation Strategies (EA-06-137)
6. Letter NLS2007011 from Stewart B. Minahan, NPPD, to USNRC dated February 28, 2007, Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies
7. Letter NLS2007031 from Stewart B. Minahan, NPPD, to USNRC dated April 30, 2007, Supplementary Response Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies
8. Letter from Carl F. Lyon, USNRC, to Stewart B. Minahan, NPPD, dated August 9, 2007, Cooper Nuclear Station - Conforming License Amendment to Incorporate the Mitigation Strategies Required by Section B.5.b of Commission Order EA-02-026 and the Radiological Protection Mitigation Strategies Required by Commission Order EA-06-137
9. Letter NLS2007073 from Stewart B. Minahan, NPPD, to USNRC, dated October 8, 2007, Amended Response to NRC Guidance Regarding Mitigation Strategies

Correspondence Number: NLS2011052

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
None		