



Nebraska Public Power District

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NLS2011114
December 23, 2011

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

Subject: Completion of License Renewal Commitment NLS2008071-08
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- Reference:**
1. NUREG-1944, "Safety Evaluation Report Related to the License Renewal of Cooper Nuclear Station," dated September 2010.
 2. Letter from Brian J. O'Grady (Nebraska Public Power District) to U.S. Nuclear Regulatory Commission, dated November 15, 2010, "Revision to License Renewal Commitment" (NLS2010100).

Dear Sir or Madam:

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) that the Nebraska Public Power District (NPPD) has completed License Renewal Commitment NLS2008071-08 Revision 4. This submittal is made pursuant to License Condition F of the Cooper Nuclear Station (CNS) renewed Operating License, which requires written NRC notification of the completion of License Renewal commitments.

Reference 1 cites Revision 2 to this commitment. Subsequent to the issuance of the CNS License Renewal Safety Evaluation Report, NPPD submitted Reference 2, which promulgated Revision 3. Following this, NPPD made a minor administrative change to the commitment under the provisions of 10 CFR 50.59. Commitment NLS2008071-08 Revision 4 reads 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.

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- (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 an environmentally adjusted 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).

To address the first part of this commitment, NPPD has calculated environmental cumulative usage factors for the required reactor vessel locations utilizing an NRC-approved methodology. The second part of the commitment was met through a revision to the governing procedure for the CNS Fatigue Monitoring Program.

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

Sincerely,



David W. Van Der Kamp
Licensing Manager

/wv

cc: Regional Administrator
USNRC - Region IV

Cooper Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC - CNS

NPG Distribution

CNS Records

Correspondence Number: NLS2011114

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		