

REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST FOR
IMPLEMENTING A 24-MONTH FUEL CYCLE AND
ADOPTION OF TSTF-493, REVISION 4, OPTION A
NEBRASKA PUBLIC POWER DISTRICT
COOPER NUCLEAR STATION
DOCKET NO. 50-298
FACILITY OPERATING LICENSE NO. DPR-46

By letter dated September 16, 2011 (Agencywide Documents Access and Management System Accession No. ML11264A165, Nebraska Public Power District (NPPD, the licensee) submitted a license amendment request (LAR) to revise the technical specifications (TS) for Cooper Nuclear Station (Cooper). The proposed LAR would implement 24 month fuel cycle and adopt TSTF-493, Revision 4, Option A. Specifically, the change addresses certain TS Surveillance Requirement frequencies that are specified as "18 months" by revising them to "24 months" in accordance with the guidance provided in NRC Generic Letter (GL) 91-04.

1. TS SR 3.8.4.8 provides a surveillance requirement of 18 months instead of 12 months for completing the performance discharge tests. It is the NRC staff's position that SR 3.8.4.8 should be consistent with industry standard IEEE 450-1995, "Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," Section 5.2.(c) which recommends "Annual performance tests of battery capacity should be made on any battery that shows signs of degradation or has reached 85% of the service life expected for the application. Degradation is indicated when the battery capacity drops more than 10% from its capacity on the previous performance test, or is below 90% of the manufacturer's rating."

Please provide the technical basis that justifies why an 18 month surveillance requirement is acceptable as opposed to "at least once per 12 months."

2. Sections 3.1.3 and 3.1.4 of Attachment 1 to the LAR describe emergency core cooling system and Low-Low Set instrumentation whose current setpoint calculations do not bound the projected 30 month drift values and require revised allowable values. Calculations were not provided for these new allowable values.

Please submit one of the revised setpoint calculations for review. In addition, please submit the corresponding drift analysis with sufficient supporting documentation as to confirm adherence to the "Instrument Drift Analysis Design Guide" in Enclosure 1 of the LAR.

3. Please provide additional detail on the surveillance test history for the emergency core cooling system (ECCS). Attachment 5 page 16 of the LAR provides details for five ECCS Technical Specification failures. Please provide the total number of surveillance tests considered or the percentage of the surveillance tests that those 5 failures represent.

ENCLOSURE