



Nebraska Public Power District

Always there when you need us

NLS2012022
March 30, 2012

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

Subject: Revision to License Renewal Commitments NLS2008071-20 and
NLS2008071-24
Cooper Nuclear Station, Docket No. 50-298, License No. DPR-46

Reference: 1. Letter from Stewart B. Minahan, Nebraska Public Power District, to U.S.
Nuclear Regulatory Commission, dated September 24, 2008, "License
Renewal Application" (NLS2008071)
2. NEI 99-04, "Guidelines for Managing NRC Commitment Changes," July
1999

Dear Sir or Madam:

The purpose of this letter is for the Nebraska Public Power District (NPPD) to notify the Nuclear Regulatory Commission (NRC) of a revision to two commitments (NLS2008071-20 and NLS2008071-24) made in Reference 1. NPPD used the Cooper Nuclear Station (CNS) commitment change process, which is modeled after Reference 2. Utilizing this process, NPPD has determined that NRC notification is required prior to the commitment implementation date of January 18, 2014. This letter constitutes that notification. The commitment changes and their justification description are attached.

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

Sincerely,

David W. Van Der Kamp
Licensing Manager

/wv

A136
NRR

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

NPG Distribution w/Attachment

CNS Records w/Attachment

ATTACHMENT

Revision to License Renewal Commitments NLS2008071-20 and NLS2008071-24

This attachment describes the original commitment, the revised commitment, and the justification for the commitment change.

Commitment Number NLS2008071-20, Revision 2

Original Commitment (Revision 1)¹: Implement the One-Time Inspection Program [LRA Section B.1.29, except that "Surface Condition" (from NUREG-1801 Revision 2 Section XI.M32 "Examples of Parameters Monitored or Inspected and Aging Effect for Specific Structure or Component" table) is included as a parameter monitored for loss of material and cracking]. Due Date: January 18, 2014

Revised Commitment (Revision 2): Implement the One-Time Inspection Program [LRA Section B.1.29], with the following exceptions. "Surface Condition" (from NUREG-1801 Revision 2 Section XI.M32 "Examples of Parameters Monitored or Inspected and Aging Effect for Specific Structure or Component" table) is included as a parameter monitored for loss of material and cracking. Components managed by the "Water Chemistry Control – BWR," "Diesel Fuel Monitoring," and "Oil Analysis" Aging Management Programs will have a representative sample size of 20% of the population (defined as components having the same material, environment, and aging effect combination) or a maximum of 25 components. Due Date: January 18, 2014

Justification: Section B.1.29 of the License Renewal Application (LRA) described the One-Time Inspection Program as being consistent with the analogous NUREG-1801, "Generic Aging Lessons-Learned (GALL) Report," Section XI.M32 program. Revision 1 of NUREG-1801 was silent on the specific population sample size for which one-time inspections would be performed. To address this, LRA Section B.1.29 committed to a sample size based on Chapter 4 of Electric Power Research Institute (EPRI) document 107514, "Age-Related Degradation Inspection Method and Demonstration." This document outlined a method to determine the number of inspections required for 90% confidence that 90% of the population does not experience degradation (90/90). With the issuance of NUREG-1801, Revision 2, the Nuclear Regulatory Commission (NRC) established their preferred sample size criteria described in the above revised commitment. The Nebraska Public Power District (NPPD) believes it is most technically appropriate to use sample size criteria that has been approved by the NRC, in consideration of the industry-wide operating experience incorporated into Revision 2 of the GALL.

¹ Revision 1 to Commitment Number NLS2008071-20 was made previously under the provisions of 10 CFR 50.59.

Commitment Number NLS2008071-24, Revision 1

Original Commitment (Revision 0): Implement the Selective Leaching Program [LRA Section B.1.34]. Due Date: January 18, 2014

Revised Commitment (Revision 1): Implement the Selective Leaching Program [LRA Section B.1.34], with the following exception. A representative sample size is 20% of the population (defined as components having the same material/environment combination) or a maximum of 25 components. Due Date: January 18, 2014

Justification: Section B.1.34 of the LRA described the Selective Leaching Program as being consistent with the analogous NUREG-1801, "Generic Aging Lessons-Learned (GALL) Report," Section XI.M33 program. Revision 1 of NUREG-1801 was silent on the specific population sample size for which one-time selective leaching inspections would be performed. To address this, LRA Section B.1.34 committed to a sample size based on Chapter 4 of EPRI document 107514, Age-Related Degradation Inspection Method and Demonstration. This document outlined a method to determine the number of inspections required for 90% confidence that 90% of the population does not experience degradation (90/90). With the issuance of NUREG-1801, Revision 2, the NRC established their preferred sample size criteria described in the above revised commitment. NPPD believes it is most technically appropriate to use sample size criteria that has been approved by the NRC, in consideration of the industry-wide operating experience incorporated into Revision 2 of the GALL.

Correspondence Number: NLS2012022

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		