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50.55a

NLS2012082
August 14, 2012

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

Subject: Response to Nuclear Regulatory Commission Third Request for Additional Information Re: Relief Requests RV-07 Revision 0 and RV-01 Revision 1 (TAC No. ME7021)
Cooper Nuclear Station, Docket No. 50-298, DPR-46

References: Letter from Brian J. O'Grady, Nebraska Public Power District, to the U.S. Nuclear Regulatory Commission, dated August 24, 2011, "10 CFR 50.55a Request Numbers RV-07, Revision 0, and RV-01, Revision 1"

Dear Sir or Madam:

The purpose of this letter is for Nebraska Public Power District (NPPD) to submit a response to a request for additional information (RAI) from the Nuclear Regulatory Commission (NRC) discussed in a telephone conversation on August 2, 2012 between NRC's Carl F. Lyon, Anthony McMurtray, and Michael Orenak and NPPD's Edward McCutchen and Thomas Robinson. The RAI requested information in support of NRC's review of Cooper Nuclear Station (CNS) relief requests RV-07 for Pressure Isolation Valve Leakage Tests, and RV-01 for High Pressure Coolant Injection Solenoid Valves. These relief requests are applicable to the Fourth 10-Year Interval Inservice Testing Program (Reference).

Responses to the specific RAI questions are provided in the Attachment to this letter. No regulatory commitments are made in this submittal. If you have any questions concerning this matter, please contact David Van Der Kamp, Licensing Manager, at (402) 825-2904.

Sincerely,

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

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NRR

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Attachment: Response to Nuclear Regulatory Commission Third Request for Additional Information Re: Relief Requests RV-07 Revision 0 and RV-01 Revision 1 (TAC No. ME7021)

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

**Response to Nuclear Regulatory Commission Third Request for Additional Information
Re: Relief Requests RV-07 Revision 0 and RV-01 Revision 1 (TAC No. ME7021)**

Cooper Nuclear Station (CNS), Docket No. 50-298, DPR-46

NRC Question #1

For RV-07, at what frequency is CNS performing the functional testing?

Response

For valves in NLS2011085, Attachment 1 Section 1, the Functional Test and Position Indication Test (PIT) frequencies are as follows.

Valve	Functional Test	PIT
RHR-MOV-MO25A	Quarterly	2 yrs
RHR-MOV-MO25B	Quarterly	2 yrs
RHR-MOV-MO274A	Normally De-energized Closed	Refueling Outage
RHR-MOV-MO274B	Normally De-energized Closed	Refueling Outage
RHR-CV-26CV	Refueling Outage	Refueling Outage
RHR-CV-27CV	Refueling Outage	Refueling Outage
RHR-MOV-MO17	Cold S/D	Refueling Outage
RHR-MOV-MO18	Cold S/D	Refueling Outage
CS-MOV-MO12A	Cold S/D	Refueling Outage
CS-MOV-MO12B	Cold S/D	Refueling Outage
CS-CV-18CV	Refueling Outage	Refueling Outage
CS-CV-19CV	Refueling Outage	Refueling Outage

NRC Question #2

For RV-01, are any alternative inspection intervals going to be submitted, since there is very little data for HPCI-SOV-SSV64? And if deficiencies are found in either valve, would CNS reduce both valves' intervals back to 18 months?

Response

For HPCI-SOV-SSV64 or HPCI-SOV-SSV87, following a repair for an unsatisfactory acceptance criteria step or valve replacement, CNS agreed to collect at least 2 sets of acceptable data before extending the frequency of a specific valve to a frequency beyond 18 months, but not to exceed 36 months. The span of acceptable tests shall support the new test frequency. For future testing, if an unsatisfactory acceptance criteria step is found in either valve, CNS will reduce the frequency back to 18 months for both valves for one cycle. If it can be shown that the deficiency is not from a cause that could be common to both valves, the valve without the unsatisfactory acceptance criteria can return to a 36 month frequency after the one 18 month cycle.