



Nebraska Public Power District

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NLS2013012
January 24, 2013

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

Subject: Response to March 12, 2012, Request for Information Enclosure 2,
Recommendation 2.1, Flooding, Required Response 1, Integrated Assessment
Approach
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:
1. Nuclear Regulatory Commission (NRC) Letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, March 12, 2012 (ADAMS Accession No. ML12053A340)
 2. NRC Interim Staff Guidance JLD-ISG-2012-05, *Guidance for Performing the Integrated Assessment for External Flooding*, Revision 0 (ADAMS Accession No. ML12311A214)
 3. NRC Letter, D.L. Skeen (NRC) to J.E. Pollock (NEI), *Trigger Conditions for Performing an Integrated Assessment and Due Date for Response*, December 3, 2012 (ADAMS Accession No. ML12326A912)

Dear Sir or Madam:

On March 12, 2012, the NRC staff issued Reference 1 to request information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for Flooding. Item 2 of Enclosure 2 to Reference 1 requests an Integrated Assessment Report from plant sites whose reevaluated flooding hazard is not bounded by their current design basis. Further, Required Response 1 states: "Within 60 days of the date of the NRC's issuance of guidance on implementation details of the Integrated Assessment Report, including criteria for identifying vulnerabilities, submit an approach for developing an Integrated Assessment Report including criteria for identifying vulnerabilities."

The following is Nebraska Public Power District's (NPPD) 60-day response to Required Response 1.

On November 30, 2012, the NRC issued the Reference 2 Interim Staff Guidance. NPPD commits to use the Reference 2 guidance as the approach for developing the NTTF 2.1 flooding Integrated Assessment Report for Cooper Nuclear Station (CNS) if the reevaluated flooding hazard is not bounded by the current design basis flooding evaluation.

NPPD also commits to use the guidance provided in Reference 3 regarding the trigger conditions and scope of any required Integrated Assessment.

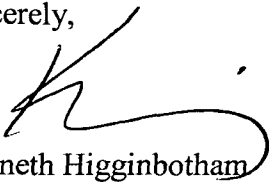
This letter contains two new regulatory commitments, which are identified in the attachment.

Should you have any questions regarding this submittal, please contact David Van Der Kamp, Licensing Manager, at (402) 825-2904.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On 1/24/13
(Date)

Sincerely,



Kenneth Higginbotham
General Manager of Plant Operations

/bk

Attachment: List of Regulatory Commitments

cc: Regional Administrator, w/attachment
USNRC - Region IV

Director, w/attachment
USNRC - Office of Nuclear Reactor Regulation

Cooper Project Manager, w/attachment
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector, w/attachment
USNRC - CNS

G. Edward Miller, w/attachment
USNRC - NRR

NPG Distribution, w/attachment

CNS Records, w/attachment

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ATTACHMENT

LIST OF REGULATORY COMMITMENTS

List of Regulatory Commitments

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
<p>NPPD commits to use Interim Staff Guidance JLD-ISG-2012-05, <i>Guidance for Performing the Integrated Assessment for External Flooding</i>, Revision 0, as the approach for developing the NTTF 2.1 flooding Integrated Assessment Report for CNS if the reevaluated flooding hazard is not bounded by the current design basis flooding evaluation.</p> <p>NLS2013012-01</p>	✓		<p>March 12, 2016 (completion date for Integrated Assessment if required)</p>
<p>NPPD commits to use the guidance provided in NRC Letter, D.L. Skeen (NRC) to J.E. Pollock (NEI), <i>Trigger Conditions for Performing an Integrated Assessment and Due Date for Response</i>, regarding the trigger conditions and scope of any required Integrated Assessment.</p> <p>NLS2013012-02</p>	✓		<p>March 12, 2016 (completion date for Integrated Assessment if required)</p>