



**Nebraska Public Power District**

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NLS2013024  
February 28, 2013

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

**Subject:** Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements For Mitigation Strategies For Beyond-Design-Basis External Events (Order Number EA-12-049) Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Nuclear Regulatory Commission Order Number EA-12-049, *Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012
  2. Nuclear Regulatory Commission Interim Staff Guidance JLD-ISG-2012-01, *Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, Revision 0, dated August 29, 2012
  3. Nuclear Energy Institute 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, Revision 0, dated August 2012
  4. Nebraska Public Power District letter to Nuclear Regulatory Commission, *Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)*, dated October 29, 2012

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an Order (Reference 1) to Nebraska Public Power District (NPPD). Reference 1 was immediately effective and requires provisions for mitigating strategies for beyond-design-basis external events. Specific requirements are outlined in the Enclosure of Reference 1.

Reference 1 requires submission of an Overall Integrated Plan by February 28, 2013. The NRC Interim Staff Guidance (Reference 2) was issued August 29, 2012, and endorses industry guidance document Nuclear Energy Institute 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 3 provides direction regarding the content of this Overall Integrated Plan. The purpose of this letter is to provide the Overall Integrated Plan pursuant to Section IV, Condition C.1, of Reference 1.

**COOPER NUCLEAR STATION**

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Reference 3, Section 13, contains submittal guidance for the Overall Integrated Plan. The attachment to this letter provides Cooper Nuclear Station's Overall Integrated Plan pursuant to Reference 3.

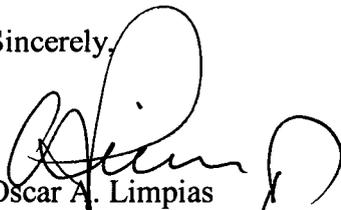
Reference 4 provided NPPD's initial status report regarding mitigation strategies for beyond-design-basis external events, as required by Reference 1. NPPD has not yet identified any impediments to compliance with the Order, i.e., no later than two refueling cycles after submittal of the integrated plan, or December 31, 2016, whichever comes first. NPPD will evaluate potential modifications, identified in the attachment, to implement flexible coping strategies and will provide future status reports as required by Section IV, Condition C.2, of Reference 1.

This letter contains no new regulatory commitments. If you have any questions regarding this report, 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 02/28/13  
(Date)

Sincerely,



Oscar A. Limpas  
Vice President - Nuclear and  
Chief Nuclear Officer

/bk

Attachment: Cooper Nuclear Station Overall Integrated Plan for Diverse and Flexible Coping Strategies (FLEX)

- |  |   |
|--|---|
| cc: Regional Administrator, w/attachment<br>USNRC - Region IV                | Jessica A. Kratchman, w/attachment<br>USNRC - NRR |
| Director, w/attachment<br>USNRC - Office of Nuclear Reactor Regulation       | Eric E. Bowman, w/attachment<br>USNRC - NRR       |
| Cooper Project Manager, w/attachment<br>USNRC - NRR Project Directorate IV-1 | Eileen M. McKenna, w/attachment<br>USNRC - NRO    |
| Senior Resident Inspector, w/attachment<br>USNRC - CNS                       | NPG distribution, w/o attachment                  |
| CNS Records, w/attachment  |   |