



**Nebraska Public Power District**

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NLS2013056  
June 25, 2013

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

**Subject:** Capability to Perform Offsite Dose Assessment During an Event Involving  
Multiple Release Sources  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Nuclear Regulatory Commission Letter to Nuclear Energy Institute,  
*Commitment for Implementation of Multi-Unit Dose Assessment Capability*,  
dated February 27, 2013
  2. Nuclear Energy Institute Letter to Nuclear Regulatory Commission,  
*Commitment for Implementation of Multi-Unit Dose Assessment Capability*,  
dated March 14, 2013

Dear Sir or Madam:

In Reference 1, the Nuclear Regulatory Commission (NRC) requested additional detailed information regarding licensee's site-specific current or planned multi-unit dose assessment capabilities. In Reference 2, the Nuclear Energy Institute notified the NRC that licensees would provide the requested detailed information directly to the NRC via letter. Reference 2 also identified the scope of the detailed information that would be provided.

In accordance with Reference 2, Attachment 1 to this letter provides Nebraska Public Power District's response regarding the current and anticipated capabilities of Cooper Nuclear Station to perform offsite dose assessment during an event involving multiple release sources (e.g., assess concurrent releases from a reactor containment and a spent fuel pool).

This letter contains two new regulatory commitments which are identified in Attachment 2.

If you have any questions concerning the content of this letter, please contact David Van Der Kamp, Licensing Manager, at (402) 825-2904.

**COOPER NUCLEAR STATION**

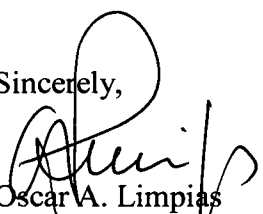
P.O. Box 98 / Brownville, NE 68321-0098  
**Telephone:** (402) 825-3811 / **Fax:** (402) 825-5211  
www.nppd.com

A001  
NRR

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

Executed On 06/25/13  
(Date)

Sincerely,

  
Oscar A. Limpias  
Vice President / Nuclear and  
Chief Nuclear Officer

/bk

- Attachments:
1. Capability to Perform Offsite Dose Assessment During An Event Involving Multiple Release Sources
  2. List of Regulatory Commitments

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

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

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

Senior Resident Inspector, w/attachments  
USNRC - CNS

Sue Perkins-Grew, w/attachments  
Nuclear Energy Institute  
[spg@nei.org](mailto:spg@nei.org)

CNS Records, w/attachments

NPG Distribution, w/o attachments

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**ATTACHMENT 1**

**CAPABILITY TO PERFORM OFFSITE  
DOSE ASSESSMENT DURING AN EVENT  
INVOLVING MULTIPLE RELEASE SOURCES**

**Attachment 1**

**Capability to Perform Offsite Dose Assessment  
During an Event Involving Multiple Release Sources**

Request #1:

Provide a summary of your current capability to perform multi-source dose assessment.

NPPD Response:

Currently, Nebraska Public Power District (NPPD) utilizes the CNS-DOSE dose assessment computer program to perform offsite dose assessment. This program does not currently have the ability to perform simultaneous multiple release point calculations. In the event of a scenario with concurrent releases from more than one release point, separate dose analysis runs can be performed with CNS-DOSE using the applicable data inputs for each release point. The results of the separate dose consequence analyses can be manually summed to determine a total offsite dose consequence. Instructions for performing this type of manual analysis will be proceduralized.

Request #2:

If you do not possess this capability or do so only partially, describe your anticipated schedule to fully establish it on both an interim and/or permanent basis. Combined License holders should state that they will address the implementation of a multi-source dose assessment capability consistent with their licensing, construction and startup schedules. Provide the due dates associated with key actions or milestones – no due date should exceed December 31, 2014.

NPPD Response:

NPPD will revise the existing offsite dose assessment computer methodology to include the capability to automatically sum selected dose assessment results using a revised computer code by December 31, 2014. The new code methodology contained in the revised computer based offsite dose assessment model is planned for implementation at Cooper Nuclear Station (CNS) in accordance with the following milestones and projected completion dates:

Milestone	Projected Completion Date
Revise and test new dose assessment computer code	May 31, 2014
Develop draft procedures and training documents	June 30, 2014
Complete all training	August 31, 2014

Procedural guidance and training for manually summing the individual offsite dose assessment results is being developed and once implemented, will provide adequate interim capability and will continue to be relied upon until full implementation of the revised dose assessment computer code capability is achieved. This interim manual method will be implemented at CNS by December 31, 2013, in accordance with the following milestones and projected completion dates:

Milestone	Projected Completion Date
Revise and test interim dose assessment method	September 30, 2013
Develop draft procedures and training documents	October 31, 2013
Complete all training	December 31, 2013

Request #3:

If you provided information for #2 above, state the administrative process that will be used to track completion of the described key actions or milestones (e.g., a commitment tracking or corrective action system), and specify the appropriate tracking identifiers (e.g., a corrective action system number).

NPPD Response:

NPPD will revise the existing offsite dose assessment computer methodology to include the capability to automatically sum selected dose assessment results using a revised computer code. NPPD will develop and implement interim procedural guidance and training for manually summing the individual offsite dose assessment results until full implementation of the revised dose assessment computer code capability is achieved. These commitments will be tracked in CNS' regulatory commitment tracking system as commitment numbers NLS2013056-01 and NLS2013056-02.

Other milestone actions to achieve implementation of the interim manual dose assessment method and full implementation of the revised offsite dose assessment computer methodology will be tracked under tracking action number LO 2013-0503. These milestone actions and projected completion dates are not commitments and may be adjusted as necessary.

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**ATTACHMENT 2**

**COOPER NUCLEAR STATION  
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 will revise the existing offsite dose assessment computer methodology to include the capability to automatically sum selected assessment results using a revised computer code.</p> <p><b>NLS2013056-01</b></p>		✓	December 31, 2014
<p>NPPD will develop and implement interim procedural guidance and training for manually summing the individual offsite dose assessment results until full implementation of the revised dose assessment computer code capability is achieved.</p> <p><b>NLS2013056-02</b></p>	✓		December 31, 2013