



Nebraska Public Power District

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NLS2013078
August 27, 2013

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

Subject: Nebraska Public Power District's First Six-Month Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012
 2. NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012
 3. NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,"" Revision 1, dated August 2012
 4. Nebraska Public Power District's Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 26, 2012 (NLS2012111)
 5. Cooper Nuclear Station's Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013 (NLS2013026)

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission issued an Order (Reference 1) to Nebraska Public Power District (NPPD). Reference 1 was immediately effective and directs NPPD to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1, (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided NPPD's initial status report for Cooper Nuclear Station (CNS) regarding reliable spent fuel pool instrumentation. Reference 5 provided CNS' overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. Should 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: 8/27/13

Sincerely,



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

/bk

Attachment: Cooper Nuclear Station's First Six-Month Status Report for the
Implementation of Order EA-12-051, Order Modifying Licenses with Regard to
Reliable Spent Fuel Pool Instrumentation

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

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Senior Resident Inspector, w/attachment
USNRC – CNS

NPG Distribution, w/attachment

CNS Records, w/attachment

Attachment

Cooper Nuclear Station's First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation

Introduction

Nebraska Public Power District (NPPD) developed an overall integrated plan for Cooper Nuclear Station (Reference 1), documenting the requirements to install reliable spent fuel pool level instrumentation, in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the overall integrated plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

Milestone Accomplishments

The following milestone(s) have been completed since the development of the overall integrated plan (Reference 1), and are current as of July 30, 2013:

- A preliminary Scoping Study was completed on February 15, 2013.
- Purchase order 4500161756 for supply of the reliable spent fuel pool instrumentation system material was issued to Mohr Test and Measurement, LLC on July 15, 2013.

Milestone Schedule Status

The following provides an update to the milestone schedule to support the overall integrated plan. This section provides the activity status of each item, and the expected completion date noting any change. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Not Started	
Update 3	Aug 2014	Not Started	
Update 4	Feb 2015	Not Started	
Update 5	Aug 2015	Not Started	

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Update 6	Feb 2016	Not Started	
Update 7	Aug 2016	Not Started	
Modifications:			
Complete Scoping Study	Feb 2013	Complete	
Generate Detailed Design	Oct 2014	Not Started	
Complete Refueling 28 Outage Walkdowns	Nov 2014	Not Started	
Complete Procurement of Parts	Dec 2014	Started	
Complete Detailed Design	Oct 2015	Not Started	
Complete Installation Outage	Oct 2016	Not Started	
Complete Installation/Testing Outage	Nov 2016	Not Started	
In-service/Mod Complete	Nov 2016	Not Started	
Procedures:			
Create Procedures	June 2016	Not Started	
Training:			
Develop Training Plan	Aug 2016	Not Started	
Training Complete	Oct 2016	Not Started	

Changes to Compliance Method

Section 4.1 of the overall integrated plan submitted on February 28, 2013, described the measurement range of the system from one foot above normal level of the pool to one foot below the top of the fuel rack. In discussion with the system supplier, it has been determined that extension of the level system below the top of the fuel rack could create the risk of physical contact between the system probe and the rack. For this reason, the system probe will stop approximately six inches above the top of the rack. This will still allow the system to conservatively measure to level three within ± 12 inch accuracy required by NEI 12-02, Industry Guidance for Compliance with Nuclear Regulatory Commission (NRC) Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation."

Section 6.5 of the overall integrated plan submitted on February 28, 2013, described the various power supply options for the primary and backup instrument channels, including an internal battery for each channel that will supply power for between four and twenty-four hours, and an external battery that will provide power up to seven days. During the system development process, Mohr has eliminated the internal battery, but the seven day external battery remains for each channel.

Need for Relief/Relaxation and Basis for the Relief/Relaxation

NPPD expects to comply with the Order implementation date and no relief/relaxation is required at this time.

Open Items from Overall Integrated Plan and Draft Safety Evaluation

None.

Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

References

The following references support the updates to the overall integrated plan described in this attachment.

1. Cooper Nuclear Station's Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013.
2. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012.