



Nebraska Public Power District

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NLS2013092
October 1, 2013

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

Subject: Supplemental Information Related to Response to Request for Additional Information Regarding Core Plate Hold Down Bolt Stress Analysis Cooper Nuclear Station; Docket No. 50-298, License No. DPR-46

- Reference:**
1. Letter from Oscar A. Limpias, Nebraska Public Power District, to U.S. Nuclear Regulatory Commission, dated July 3, 2013, "Response to Request for Additional Information Regarding Core Plate Hold Down Bolt Stress Analysis" (NLS2013065)
 2. Letter from David W. Van Der Kamp, Nebraska Public Power District, to U.S. Nuclear Regulatory Commission, dated January 16, 2012, "Completion of License Renewal Commitment NLS2009100-1 (Revision 1)" (NLS2012002)
 3. E-mail from Lynnea Wilkins, U.S. Nuclear Regulatory Commission, to David Van Der Kamp, Nebraska Public Power District, dated September 20, 2013, "Cooper – Request for Additional Information Regarding Core Plate Hold Down Bolt Stress Analysis (ME9550)"
 4. Letter from George A. Wilson, U.S. Nuclear Regulatory Commission, to Vermont Yankee Site Vice President, Entergy Nuclear Operations, Inc., dated March 28, 2012, "Core Plate Hold Down Bolt Inspection Plan and Analysis – Vermont Yankee Nuclear Power Station (TAC No. ME6248)"

Dear Sir or Madam:

The purpose of this letter is for the Nebraska Public Power District (NPPD) to provide to the Nuclear Regulatory Commission (NRC) supplemental information related to the response to a request for additional information (RAI) provided in Reference 1 regarding the Core Plate Hold Down Bolt Stress Analysis provided in Reference 2. This submittal is made pursuant to a conference call conducted on September 19, 2013, as described in Reference 3.

In the RAI response, NPPD indicated that visual test (VT)-3 inspections would be performed on 25% of core plate bolts on the top side on a periodic basis, consistent with the Boiling Water Reactor Vessel Internals Project (BWRVIP) interim guidance. In the September 19th conference

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call, the NRC discussed NPPD's response and determined VT-3 inspections on the top side of a 25% sample of the core plate bolts every ten years provides insufficient assurance of component integrity. The NRC noted that the VT-3 inspections committed to by the Vermont Yankee Nuclear Power Station, as documented in Reference 4, provided the minimum number of inspections that would be acceptable. Accordingly, NPPD hereby makes the following commitment:


Until the NRC endorses the revised inspection guidance of BWRVIP-25, NPPD will perform VT-3 inspections on the top side of a 50% sample of the Core Plate Hold Down Bolts every other refueling outage.

A commitment is made in this submittal, as noted in the Attachment to this submittal. NPPD will implement this commitment within 30 days after receipt of the Safety Evaluation on the Core Plate Hold Down Bolt Stress Analysis. Should you have any questions concerning this matter, please contact Dave Van Der Kamp, Cooper Nuclear Station (CNS) Licensing Manager, at (402) 825-2904.

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

Executed on: 10/01/13
(Date)

Sincerely,


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

OAL/wv

Attachment: List of Regulatory Commitments

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/o Attachment

CNS Records w/Attachment

ATTACHMENT

LIST OF REGULATORY COMMITMENTS

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

COMMITMENT/COMMITMENT NO.	TYPE (Check one)		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Until the NRC endorses the revised inspection guidance of BWRVIP-25, NPPD will perform VT-3 inspections on the top side of a 50% sample of the Core Plate Hold Down Bolts every other refueling outage. [NLS2013092-01]		X	Implementation 30 days after issuance of the Safety Evaluation