



Nebraska Public Power District

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NLS2014081
August 26, 2014

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

Subject: Nebraska Public Power District's Third 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. NPPD Letter, "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. NPPD Letter, "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.

ADDI
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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 third 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.

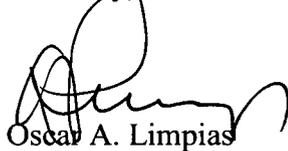
This letter contains no new regulatory commitments.

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: 8/26/14

Sincerely,



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

/bk

Attachment: Nebraska Public Power District's Third 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

Senior Resident Inspector, w/attachment
USNRC - CNS

NPG Distribution, w/attachment

CNS Records, w/attachment

Attachment

Nebraska Public Power District’s Third 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 (CNS) (Reference 2), documenting the requirements to install reliable spent fuel pool level instrumentation, in response to Nuclear Regulatory Commission (NRC) Order Number EA-12-051 (Reference 1). 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 2), and are current as of August 1, 2014:

- Although a significant amount of design work has been done, no major milestones have been completed since the last six-month update in February 2014.

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	Complete	
Update 3	Aug 2014	Complete	
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	Started	
Complete Refueling 28 Outage Walkdowns	Nov 2014	Not Started	
Complete Procurement of Parts	Dec 2014	Started	
Complete Detailed Design	Oct 2015	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

No changes to the compliance method have been made since the February 2014 six-month update.

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.

Requests for Additional Information

In Reference 4, the NRC requested additional information (RAI) regarding the overall integrated plan. In Reference 5, NPPD stated that the RAI questions could not be fully answered as the

final design was not complete. NPPD further stated that the requested information would be provided in the August 2014 status update or sooner if available.

In Reference 6, the NRC issued the interim staff evaluation (ISE) for CNS which included the previous RAIs and supplemental RAIs. The NRC requested that all information be provided by May 31, 2016, to ensure any issues are resolved prior to the date by which NPPD must complete full implementation of the Order.

In Reference 7, the NRC clarified in a public meeting that the ISE questions supersede any previous requests for information issued by the Staff concerning the spent fuel pool instrumentation. Therefore, the RAIs NPPD received in September 2013 (Reference 4) are considered superseded by the RAIs contained in the ISE for CNS (Reference 6).

In Reference 8, the NRC announced transition to a voluntary, audit-based review process and notified licensees intending to participate in the audit, to not formally submit RAI responses on the docket, but instead, put responses and any other supporting information on their ePortal systems by the date identified in their ISE.

The following table lists the open RAIs from the ISE. NPPD has continued working with the equipment vendor, Mohr, to finalize the design for CNS, but a delay in receiving the final Mohr design documents has delayed completion of the modification package. As such, NPPD is not ready to respond to the RAIs on the ePortal system at this time. NPPD anticipates providing the RAI responses on the ePortal system by March 2015.

Interim Staff Evaluation - Open RAIs		
ISE RAI #	ISE Section Description	Status
RAI #1	Spent Fuel Pool Water Levels	In progress
RAI #2 a,b	Design Features - Arrangement	In progress
RAI #3 a,b,c	Design Features - Mounting	In progress
RAI #4	Design Features - Mounting	In progress
RAI #5	Design Features - Mounting	In progress
RAI #6	Qualification and Reliability	In progress
RAI #7	Qualification and Reliability	In progress
RAI #8 a,b	Design Features - Independence	In progress
RAI #9 a,b	Design Features - Power Supplies	In progress

RAI #10	Number not used	N/A
RAI #11 a,b	Design Features - Accuracy	In progress
RAI #12 a,b,c,d	Design Features - Testing	In progress
RAI #13 a,b	Design Features - Display	In progress
RAI #14	Programmatic Controls - Procedures	In progress
RAI #15 a,b,c	Programmatic Controls - Testing and Calibration	In progress

Potential Draft Safety Evaluation Impacts

There are no potential impacts to the draft safety evaluation identified at this time.

References

1. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012
2. NPPD Letter "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)
3. NPPD Letter "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)," dated August 27, 2013 (NLS2013078)
4. NRC Email from Lynnea Wilkins to David Van Der Kamp, NPPD, "RAI for Cooper Re: Reliable Spent Fuel Pool Instrumentation Order Response (Overall Integrated Plan) (MF0971)," dated September 12, 2013
5. NPPD Letter "Response to Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order EA-12-051)," dated October 14, 2013 (NLS2013091)
6. NRC Letter "Cooper Nuclear Station - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0971)," dated December 4, 2013
7. NRC Memorandum "Summary of the November 26, 2013, Public Meeting to Discuss Industry Responses to the Staff Interim Evaluations for Spent Fuel Pool Instrumentation," dated December 26, 2013

NLS2014081

Attachment

Page 5 of 5

8. NRC Letter “Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051, ” dated March 26, 2014