



Nebraska Public Power District

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NLS2015030
February 25, 2015

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

Subject: Response to Nuclear Regulatory Commission Requests for Additional Information for License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Make-Up Water (TAC No. MF4716)
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Email from Siva Lingam, U.S. Nuclear Regulatory Commission, to Jim Shaw, Nebraska Public Power District, dated January 29, 2015, "Cooper Nuclear Station – Requests for Additional Information (RAIs) for License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Make-Up Water (TAC No. MF4716)"
 2. Letter from Oscar A. Limpias, Nebraska Public Power District, to the U.S. Nuclear Regulatory Commission, dated August 26, 2014, "License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Makeup Water"

Dear Sir or Madam:

The purpose of this letter is for the Nebraska Public Power District to respond to the Nuclear Regulatory Commission's Request for Additional Information (RAI) (Reference 1) related to the Cooper Nuclear Station License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Makeup Water (Reference 2).

The responses to the specific RAI questions are provided in the attachment to this letter.

This letter does not contain any new regulatory commitments.

If you have any questions concerning this matter, please contact Jim Shaw, Licensing Manager, at (402) 825-2788.

COOPER NUCLEAR STATION

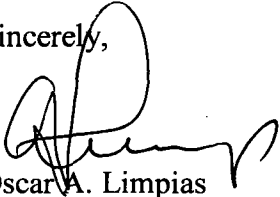
P.O. Box 98 / Brownville, NE 68321-0098
Telephone: (402) 825-3811 / **Fax:** (402) 825-5211
www.nppd.com

A001
NRR

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

Executed on: 02/25/15
(Date)

Sincerely,



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

/jo

Attachments: Response to Nuclear Regulatory Commission Requests for Additional
Information for License Amendment Request to Delete Condensate Storage Tank
as an Alternate Source of Make-Up Water

cc: Regional Administrator w/ attachments
USNRC - Region IV

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

Senior Resident Inspector w/ attachments
USNRC - CNS

NPG Distribution w/o attachments

CNS Records w/ attachments

Attachment

Response to Nuclear Regulatory Commission Requests for Additional Information for License Amendment Request to Delete Condensate Storage Tank as an Alternate Source of Make-Up Water (TAC No. MF4716)

Cooper Nuclear Station, Docket No. 50-298, DPR-46

The Nuclear Regulatory Commission request for additional information regarding the request to delete Condensate Storage Tank as an Alternate Source of Make-Up Water is shown in italics. The Nebraska Public Power District response to the request is shown in block font.

RAI-1

If CST 'A' is deleted as an alternate source of water, how will make up water be provided to the Reactor Pressure Vessel if the ECCS is inoperable as a result of suppression pool water level below the required limit?

NPPD Response:

With the suppression pool water level below 12 feet 7 inches, Emergency Core Cooling System (ECCS) remains available for make up water to the Reactor Pressure Vessel (RPV). Even though CST 'A' does not meet the seismic qualification, it remains available as a water source for ECCS.

The suppression pool will never be intentionally drained down below 12 feet 7 inches. In the event of inadvertent drain down below 12 feet 7 inches, Limiting Condition for Operation 3.5.2, Condition 'C' will be entered, and all operations with a potential for draining the reactor vessel (OPDRVs) must be suspended immediately along with restoration of ECCS operability within 4 hours. ECCS operability in this case is contingent upon restoring suppression pool water level above the required 12 feet 7 inches. Restoration will be accomplished via Emergency Operating Procedure 5.8.14, Suppression Pool Make Up Systems.

The Main Condensate System or Reactor Building Auxiliary Condensate Booster Pump would be used to provide make up to the suppression pool thru the High Pressure Coolant Injection minimum flow line, the Reactor Core Isolation Cooling minimum flow line, the Residual Heat Removal Suppression Pool Cooling line, or the Core Spray test line. Water sources for these injection options are the Condensate Storage Tank 'A', Condensate Storage Tank 'B', Demineralized Water Tank, Main Condenser 'A', Main Condenser 'B'. With adequate water level restored to the suppression pool, ECCS operability is restored.

RAI-2

Provide justification for not having an alternate source of water once the suppression pool is less than the required limit, making ECCS inoperable.

NPPD Response:

The Outage Shutdown Safety procedure provides restrictions for OPDRV evolutions. OPDRVs are limited by the unprotected hole size in such a way that 24 hours of drain time is assured from nominal refuel level to RPV flange.

In the unlikely, unintentional event an OPDRV condition existed simultaneously with ECCS inoperability as a result of low suppression pool water level, 20 hours of margin is assured by the restrictions of the procedure. ECCS operability will be restored long before water level in the RPV reaches the RPV flange.