



**Nebraska Public Power District**

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NLS2015083  
September 29, 2015

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

**Subject:** Rescission of License Renewal Commitment to Recoat the Torus  
Cooper Nuclear Station; Docket No. 50-298, License No. DPR-46

**Reference:**

1. Letter from Brian J. O'Grady, Nebraska Public Power District, to U.S. Nuclear Regulatory Commission, dated May 4, 2010, "Response to Open Items from the Safety Evaluation Report and Request for Additional Information Related to the License Renewal of Cooper Nuclear Station" (NLS2010050)
2. NUREG-1944, "Safety Evaluation Report Related to the License Renewal of Cooper Nuclear Station," dated October 2010

Dear Sir or Madam:

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) that Nebraska Public Power District (NPPD) has rescinded the License Renewal commitment to recoat the Cooper Nuclear Station (CNS) torus. This submittal is made pursuant to License Condition 2.F of the CNS renewed Operating License, which requires written NRC notification of the implementation of (and by inference the rescission of) License Renewal commitments.

In Reference 1, NPPD made the following commitment:

NPPD will recoat the wetted portion of the CNS torus within three years after entering the PEO. (Due Date: January 18, 2017) (Commitment NLS2010050-01)

This commitment was affirmed in Appendix A of Reference 2. After receipt of the renewed Operating License on November 29, 2010, NPPD commenced implementation activities for the new and enhanced Aging Management Programs. During this time, NPPD began reconsidering the prudence of recoating the torus from a technical perspective. An engineering study was commissioned for Structural Integrity Associates, Inc. to examine the general corrosion being experienced by the CNS torus. The study concluded that if maintenance (e.g., desludging, inspection, and coating repairs) is performed on a regular basis, and high water quality is maintained, the general corrosion of the torus carbon steel components will continue to be mitigated and the service life of the coating system will continue to ensure structural integrity during the period of extended operation, without recoating of the torus. It further concluded there is no technical justification for recoating the CNS torus. NPPD has formally credited these

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additional activities in the Containment Inspection Program, and in the CNS Updated Safety Analysis Report.

This commitment rescission was made under the provisions of 10 CFR 50.59, as allowed by CNS License Condition 2.E (as modified by CNS License Amendment 247), which concluded that prior NRC approval was not required. Notwithstanding, this matter was discussed with the NRC Staff on June 17, 2015, prior to making the change effective. Conforming changes were made to two other License Renewal commitments related to the torus recoat under the provisions of 10 CFR 50.59, as follows:

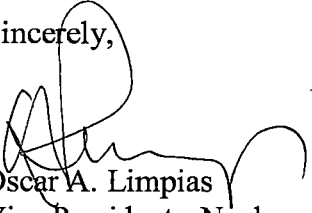
NPPD will remove sludge and inspect the wetted portion of the torus every refueling outage from now until the ~~torus is recoated~~ end of the period of extended operation.  
(Commitment NLS2010050-02)

NPPD will complete an analysis following each torus inspection that demonstrates that the projected pitting of the torus up to the next inspection interval ~~time that the torus is recoated~~, will not result in reduction of torus wall thickness below minimum acceptable values. (Commitment NLS2010050-03)

The modified commitments are contained in the attachment to this letter.

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

Sincerely,



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

/lb

cc: Regional Administrator  
USNRC - Region IV

Cooper Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC - CNS

Greg Pick  
USNRC - Region IV

NPG Distribution

CNS Records

LIST OF REGULATORY COMMITMENTS

This table identifies actions discussed in this letter which Nebraska Public Power District commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are not regulatory commitments.

COMMITMENT/COMMITMENT NO.	TYPE (Check one)		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
NPPD will remove sludge and inspect the wetted portion of the torus every refueling outage from now until the end of the period of extended operation. (NLS2010050-02 Rev. 1)		X	End of period of extended operation
NPPD will complete an analysis following each torus inspection that demonstrates that the projected pitting of the torus up to the next inspection interval will not result in reduction of torus wall thickness below minimum acceptable values. (NLS2010050-03 Rev. 1)		X	End of period of extended operation