



Nebraska Public Power District

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NLS2015132
December 9, 2015

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: Commitment to Maintain Severe Accident Management Guidelines
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Dear Sir or Madam:

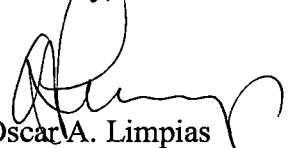
The Nuclear Energy Institute (NEI) Nuclear Strategic Issues Advisory Committee (NSIAC) recently approved an Industry Initiative to implement and maintain Severe Accident Management Guidelines (SAMGs). This letter establishes commitments related to SAMGs for Cooper Nuclear Station. These guidelines would be used by emergency response personnel during accident conditions that progress beyond the mitigation capabilities described in the Emergency Operating Procedures. SAMG strategies are intended to arrest the progression of fuel damage, maintain the capability of the containment as long as possible, and minimize radiological releases.

The new SAMG commitments are listed in Attachment 1.

It is expected that U.S. Nuclear Regulatory Commission (NRC) staff personnel will conduct periodic inspection of our SAMGs and performance deficiencies, if any, will be assessed using the Reactor Oversight Process. We also understand that inspection activities will not extend to NRC review and approval of SAMG strategies, or the use of equipment described in the SAMGs.

Should you have any questions concerning the content of this letter, please contact Jim Shaw, Licensing Manager, at (402) 825-2788.

Sincerely,


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

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A001
NRC

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Attachment: List of Regulatory Commitments

cc: Regional Administrator w/attachment
USNRC - Region IV

Director, Office of Nuclear Reactor Regulation w/attachment
USNRC

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

LIST OF REGULATORY COMMITMENTS

This table identifies those actions committed to by Nebraska Public Power District in this document. Any other statements 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 | |
| Cooper Nuclear Station will consider the site SAMGs within plant configuration management processes in order to ensure that the SAMGs reflect changes to the facility over time. (NLS2015132-01) | | X | October 31, 2016 |
| Cooper Nuclear Station will update the site SAMGs to Revision 3 of the Boiling Water Reactor Owners Group (BWROG) generic severe accident guidelines (published February, 2013). (NLS2015132-02) | X | | June 30, 2017 |
| Cooper Nuclear Station will update the site SAMGs to future revisions of the BWROG generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, <i>Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents</i> . ¹ (NLS2015132-03) | | X | Within 2 refueling outages or 3 years of the publication date of the guidelines, whichever is greater |

¹ Use of NEI 14-01 guidance begins with the update to Revision 4 of the BWROG generic severe accident guidelines.