



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 3, 2017

Mr. Kenneth Higginbotham
Vice President-Nuclear and CNO
Nebraska Public Power District
Cooper Nuclear Station
72676 648A Avenue
P.O. Box 98
Brownville, NE 68321

SUBJECT: COOPER NUCLEAR STATION - STAFF REVIEW OF SPENT FUEL POOL
EVALUATION ASSOCIATED WITH REEVALUATED SEISMIC HAZARD
IMPLEMENTING NEAR-TERM TASK FORCE RECOMMENDATION 2.1 (CAC
NO. MF3734)

Dear Mr. Higginbotham:

The purpose of this letter is to inform Nebraska Public Power District (NPPD, the licensee), of the results of the U.S. Nuclear Regulatory Commission (NRC) staff's review of the spent fuel pool (SFP) evaluation for Cooper Nuclear Station (CNS), which was submitted in response to Item 9 of Enclosure 1 of the NRC's March 12, 2012, request for information (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), issued under Title 10 of the *Code of Federal Regulations* Part 50, Section 50.54(f) (hereafter referred to as the 50.54(f) letter). The NRC staff concludes that the licensee's assessment was performed consistent with the NRC endorsed SFP Evaluation Guidance Report and that the licensee has provided sufficient information to complete the response to Item 9 of the 50.54(f) letter.

BACKGROUND

On March 12, 2012, the NRC issued a 50.54(f) letter as part of implementing lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 1 to the 50.54(f) letter requested that licensees reevaluate seismic hazards at their sites using present-day methodologies and guidance. Enclosure 1, Item 4, of the 50.54(f) letter requested that licensees perform a comparison of the ground motion response spectrum (GMRS) and the safe shutdown earthquake (SSE). The staff's assessment of the information provided in response to Items 1-3, 5-7 and the comparison portion of Item (4) of the 50.54(f) letter is provided by letter dated September 8, 2015 (ADAMS Accession No. ML15240A030). Enclosure 1, Item 9, of the 50.54(f) letter requested that, when the GMRS exceeds the SSE in the 1 to 10 Hertz frequency range, a seismic evaluation be made of the SFP. More specifically, plants were asked to consider "...all seismically induced failures that can lead to draining of the SFP."

By letter dated February 23, 2016 (ADAMS Accession No. ML16055A021), the Nuclear Energy Institute (NEI) staff submitted Electric Power Research Institute (EPRI) Report No. 3002007148 entitled, "Seismic Evaluation Guidance: Spent Fuel Pool Integrity Evaluation" (SFP Evaluation Guidance Report). The SFP Evaluation Guidance Report provides criteria for evaluating the seismic adequacy of an SFP to the reevaluated GMRS hazard levels. This report supplements the guidance in EPRI Report 1025287, "Seismic Evaluation Guidance: Screening, Prioritization and Implementation Details (SPID)" (ADAMS Accession No. ML12333A170) for plants where the GMRS peak spectral acceleration is less than or equal to 0.8g (low GMRS sites). The NRC endorsed the SFP Evaluation Guidance Report by letter dated March 17, 2016 (ADAMS Accession No. ML15350A158), as an acceptable method for licensees to use when responding to Item 9 in Enclosure 1 of the 50.54(f) letter.

By letter dated October 27, 2015 (ADAMS Accession No. ML15194A015), the NRC staff stated that SFP evaluation submittals for low GMRS sites are expected by December 31, 2016.

REVIEW OF LICENSEE SPENT FUEL POOL EVALUATION

By letter dated September 14, 2016 (ADAMS Accession No. ML16272A263), NPPD submitted its SFP evaluation for CNS for NRC review. The NRC staff assessed the licensee's implementation of the SFP Evaluation Guidance Report through the completion of a reviewer checklist, which is included as an enclosure to this letter.

TECHNICAL EVALUATION

Section 3.0 of the SFP Evaluation Guidance Report develops SFP evaluation criteria for plants with GMRS peak spectral acceleration less than or equal to 0.8g. These criteria address SFP structural elements (e.g., floors, walls, and supports); non-structural elements (e.g., penetrations); seismically-induced SFP sloshing; and water losses due to heat-up and boil-off. Section 3 also provides applicability criteria, which will enable licensees to determine if their site-specific conditions are within the bounds considered in developing the evaluation criteria for this report. The staff's review consists of confirming that these SFP site-specific conditions are within the bounds considered for the evaluation criteria specified in the SFP Evaluation Guidance Report.

1.1 Spent Fuel Pool Structural Evaluation

Section 3.1 of the SFP Evaluation Guidance Report provides a SFP structural evaluation approach used to demonstrate that the SFP structure is sufficiently robust against the reevaluated seismic hazard. This approach supplements the guidance in Section 7 of the SPID and followed acceptable methods used to assess the seismic capacity of structures, systems, and components (SSCs) for nuclear power plants as documented in EPRI NP-6041 "A Methodology for Assessment of Nuclear Plant Seismic Margin, Revision 1". Table 3-2 of the SFP Evaluation Guidance Report (reproduced from Table 2.3 of EPRI NP-6041) provides the structural screening criteria to assess the SFPs and their supporting structures.

The licensee stated that it followed the SFP structural evaluation approach presented in the SFP Evaluation Guidance Report and provided site-specific data to confirm its applicability.

The NRC staff reviewed the structural information provided, which included the requested site-specific data in Section 3.3 of the SFP Evaluation Guidance Report, and confirmed that the evaluation criteria are applicable to the CNS site. The staff concludes that SFP SSCs were appropriately evaluated and screened based on the seismic capacity criteria in EPRI NP-6041, and that the licensee has demonstrated that the SFP structure is sufficiently robust and can withstand ground motions with peak spectral acceleration less than or equal to 0.8g.

1.2 Spent Fuel Pool Non-Structural Evaluation

Section 3.2 of the SFP Evaluation Guidance Report provides criteria for evaluating the non-structural aspects of the SFP, such as piping connections, fuel gates, and anti-siphoning devices, as well as SFP sloshing and heat up and boil-off of SFP water inventory. Specifically, Table 3-4 of the SFP Evaluation Guidance Report provides a summary of the SFP non-structural evaluation criteria derived in Section 3.2, along with applicability criteria to demonstrate that site-specific conditions are suitable for applying the evaluation criteria.

The licensee stated that it followed the SFP non-structural evaluation approach presented in the guidance report and provided site-specific data to confirm its applicability. The staff reviewed the non-structural information provided, which included the requested site-specific data in Table 3-4 of the SFP Evaluation Guidance Report, and confirmed that the evaluation criteria are applicable to the CNS site. Therefore, the staff concludes that the licensee acceptably evaluated the non-structural considerations for SSCs whose failure could lead to potential drain-down of the SFP due to a seismic event.

CONCLUSION

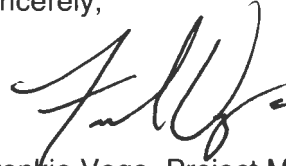
The NRC staff reviewed NPPD's SFP evaluation report. Based on its review, the NRC staff concludes that the licensee's implementation of the SFP integrity evaluation met the criteria of the SFP Evaluation Guidance Report for CNS and therefore, NPPD responded appropriately to Item 9 in Enclosure 1 of the NRC's 50.54(f) letter.

K. Higginbotham

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If you have any questions, please contact me at (301) 415-1617 or via e-mail at Frankie.Vega@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frankie Vega', written in a cursive style.

Frankie Vega, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosure:
Technical Review Checklist

cc w/encl: Distribution via Listserv

TECHNICAL REVIEW CHECKLIST
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO SPENT FUEL POOL EVALUATIONS FOR LOW
GROUND MOTION RESPONSE SPECTRUM SITES
IMPLEMENTING NEAR-TERM TASK FORCE RECOMMENDATION 2.1 SEISMIC
COOPER NUCLEAR STATION
DOCKET NO. 50-298

BACKGROUND

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f), "Conditions of License" (hereafter referred to as the "50.54(f) letter"). Enclosure 1 of the 50.54(f) letter requests addressees to reevaluate the seismic hazard at their site using present-day methods and guidance for licensing new nuclear power plants, and identify actions to address or modify, as necessary, plant components affected by the reevaluated seismic hazards. Enclosure 1, Item 4, of the 50.54(f) letter requested that licensees perform a comparison of the ground motion response spectrum (GMRS) with the safe shutdown earthquake (SSE). Enclosure 1, Item 9, requests that, when the GMRS exceeds the SSE in the 1 to 10 Hertz (Hz) frequency range, a seismic evaluation be made of the spent fuel pool (SFP). More specifically, plants were asked to consider "...all seismically induced failures that can lead to draining of the SFP."

Additionally, by letter dated February 23, 2016 (ADAMS Accession No. ML16055A021), the Nuclear Energy Institute (NEI) submitted Electric Power Research Institute (EPRI) Report No. 3002007148 entitled, "Seismic Evaluation Guidance: Spent Fuel Pool Integrity Evaluation" (SFP Evaluation Guidance Report). The SFP Evaluation Guidance Report supports the completion of SFP evaluations for sites with reevaluated seismic hazard exceedance in the 1 to 10 Hz frequency range. Specifically, the SFP Evaluation Guidance Report addressed those sites where the GMRS peak spectral acceleration (S_a) is less than or equal to 0.8g (low GMRS sites). The NRC endorsed the SFP Evaluation Guidance Report by letter dated March 17, 2016 (ADAMS Accession No. ML15350A158), as an acceptable method for licensees to use when responding to Item 9 in Enclosure 1 of the 50.54(f) letter. Licensee deviations from the SFP Evaluation Guidance should be discussed in their SFP evaluation submittal.

By letter dated September 14, 2016 (ADAMS Accession No. ML16272A263), Nebraska Public Power District (NPPD, the licensee) provided an SFP report in a response to Enclosure 1, Item 9, of the 50.54(f) letter, for the Cooper Nuclear Station(CNS).

Enclosure

The NRC staff performed its review of the licensee's submittal to assess whether the licensee responded appropriately to Item 9 in Enclosure 1 of the 50.54(f) letter. The NRC staff checked whether the site-specific parameters are within the bounds of the criteria considered in the SFP Evaluation Guidance Report, verified the SFP's seismic adequacy to withstand the reevaluated GMRS hazard levels, and confirmed that the requested information in response to Item 9 of the 50.54(f) letter was provided.

A review checklist was used for consistency and scope. The application of this staff review is limited to the SFP evaluation as part of the seismic review of low GMRS sites as part of the Near-Term Task Force (NTTF) Recommendation 2.1.

**NTTF Recommendation 2.1 Spent Fuel Pool Evaluations
Technical Review Checklist for Cooper Nuclear Station**

Site Parameters:

I. Site-Specific GMRS

<p>The licensee:</p> <ul style="list-style-type: none"> • Provided the site-specific GMRS consistent with the information provided in the Seismic Hazard and Screening Report (SHSR), or its update, and evaluated by the staff in its staff assessment. • Stated that the GMRS peak S_a is less than or equal to 0.8g for any frequency. 	<p style="text-align: center;">Yes</p> <p style="text-align: center;">Yes</p>
<p>Notes from the reviewer:</p> <p>1. The NRC staff confirmed that the site-specific peak $S_a = 0.304g$ (SHSR - ADAMS Accession No. ML14094A042).</p> <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <p style="text-align: center;">No deviations or deficiencies were identified.</p>	
<p>The NRC staff concludes:</p> <ul style="list-style-type: none"> • The site-specific GMRS peak S_a at any frequency is less than 0.8g. • The licensee's GMRS used in this evaluation is consistent with the information provided in the SHSR. 	<p style="text-align: center;">Yes</p> <p style="text-align: center;">Yes</p>

Structural Parameters:

II. Seismic Design of the SFP Structure

<p>The licensee:</p> <ul style="list-style-type: none"> • Specified the building housing the SFP. • Specified the plant's peak ground acceleration (PGA). • Stated that the building housing the SFP was designed using an SSE with a PGA of at least 0.1g. 	<p style="text-align: center;">Yes</p> <p style="text-align: center;">Yes</p> <p style="text-align: center;">Yes</p>
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<p>Notes from the reviewer:</p> <p>1. The NRC staff confirmed that the SFP is housed in the reactor building which was designed to the SSE with PGA of 0.20g (SHSR Section XII-2.2.1 and II-5.2.4).</p> <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <p>No deviations or deficiencies were identified.</p>	
<p>The NRC staff concludes that:</p> <ul style="list-style-type: none"> The structure housing the SFP was designed using an SSE with a PGA of at least 0.1g. 	<p>Yes</p>

III. Structural Load Path to the SFP

<p>The licensee:</p> <ul style="list-style-type: none"> Provided a description of the structural load path from the foundation to the SFP. Performed screening based on EPRI NP-6041 Table 2-3 screening criteria. 	<p>Yes</p> <p>Yes</p>
<p>Notes from the reviewer:</p> <p>1. The staff verified the structural load path to the SFP.</p> <p>2. Details regarding the structural path to the SFP are provided in updated final safety analysis report (UFSAR) Section XII 2.2.1 and XII 2.3.5.</p> <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <p>No deviations or deficiencies were identified.</p>	
<p>The NRC staff concludes that:</p> <ul style="list-style-type: none"> Licensee appropriately described the structural load path to the SFP. Structures were appropriately screened based on the screening criteria in EPRI NP-6041. 	<p>Yes</p> <p>Yes</p>

IV. SFP Structure Included in the Civil Inspection Program Performed in Accordance with Maintenance Rule

<p>The licensee:</p> <ul style="list-style-type: none"> Stated that the SFP structure is included in the Civil Inspection Program performed in accordance with Maintenance Rule (10 CFR 50.65). 	<p>Yes</p>
<p>Notes from the reviewer:</p> <p>None</p> <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <p>No deviations or deficiencies were identified.</p>	
<p>The NRC staff concludes that:</p> <ul style="list-style-type: none"> The SFP structure is included in the Civil Inspection Program performed in accordance with Maintenance Rule (10 CFR 50.65). 	<p>Yes</p>

Non-Structural Parameters:

V. Applicability of Piping Evaluation

<p>The licensee:</p> <ul style="list-style-type: none"> Stated that piping attached to the SFP is evaluated to the SSE. 	<p>No</p>
<p>Notes from the reviewer:</p> <ol style="list-style-type: none"> The licensee stated that the following piping systems are attached to the SFP: Fuel Pool Cooling and skimmer drains. According to the licensee, such systems were designated seismic Class IIS (not required for safe shutdown) and it could not be confirmed that they were evaluated to the SSE. The licensee stated that given the location of the penetrations associated with these piping systems, draining of the pool will be unlikely below a safe storage level (approximately 10 feet above the top of the fuel). (UFSAR Section X-3.5.1) By email dated December 15, 2016 (ADAMS ML17024A329), the NRC staff requested the licensee to provide additional information to support this conclusion. Specifically, the staff asked the licensee to evaluate the potential for boil-off and uncovering the top third of the spent fuel within 72 hours of a seismically induced pipe-break that resulted in unmitigated water loss to 10' above the top of the spent fuel. By letter dated February 8, 2017 (ADAMS ML17047A470) the licensee provided additional details regarding the piping systems attached to the SFP. The licensee 	

further described the piping configuration, considered potential losses due to siphoning and sloshing, confirmed that the previously provided evaporation evaluation is acceptable and demonstrated that any potential break of the analyzed lines would not cause a rapid drain-down of the SFP.

5. Based on the review of the justification provided by the licensee regarding the design and configuration of piping attached to the SFP, NRC staff concludes that the information provided was sufficient to confirm applicability of the piping evaluation in Section 3.2 of the SFP guidance.

Deviation(s) or Deficiency(ies), and Resolution:

No deviations or deficiencies were identified.

The NRC staff concludes that:

- The piping attached to the SFP is evaluated to the SSE.
- Failure of piping attached to the SFP is not likely to result in rapid drain-down as defined in the SFP evaluation guidance.
- Applicability criteria specified in Table 3-4 of SFP evaluation guidance have been met.

No
Yes
Yes

VI. Siphoning Evaluation

The licensee:

- Stated that anti-siphoning devices are installed on piping systems that could lead to siphoning inventory from the SFP.
- In cases where anti-siphoning devices were not included on the applicable piping, a description documenting the evaluation performed to determine the seismic adequacy of the piping is provided.
- Stated that the piping of the SFP cooling system cannot lead to rapid drain down due to siphoning.
- Stated that no anti-siphoning devices are attached to 2" or smaller piping with extremely large extended operators.
- Provided a seismic adequacy evaluation, in accordance with NP-6041, for cases where active siphoning devices are attached to 2" or smaller piping with extremely large extended operators.

Yes
N/A
No
Yes
N/A

Notes from the reviewer:

1. The licensee stated that anti-siphoning devices are installed on all SFP piping that could lead to siphoning.
2. UFSAR Section X-3.5.1 states that lines extending below 10 feet above the top of fuel are equipped with siphon devices to prevent siphon backflow.

3. Licensee stated that no active anti-siphoning devices are attached to 2" or smaller piping with extremely large extended operator.

Deviation(s) or Deficiency(ies), and Resolution:

No deviations or deficiencies were identified.

The NRC staff concludes :

- | | |
|--|-----|
| • Anti-siphoning devices exist in applicable piping systems that could lead to siphoning water from the SFP. | Yes |
| • Piping of the SFP cooling system is not likely to lead to rapid draindown due to siphoning | Yes |
| • No active anti-siphoning devices are attached to 2" or smaller piping with extremely large extended operators. | Yes |
| • Applicability criteria specified in Table 3-4 of SFP evaluation guidance have been met. | Yes |

VII. Sloshing Evaluation

<p>The licensee:</p> <ul style="list-style-type: none"> Specified the SFP dimensions (length, width, and depth). Specified that the SFP dimensions are bounded by the dimensions specified in the report (i.e. SFP length and width <125ft.; SFP depth >36ft.). Stated that the peak Sa in the frequency range less than 0.3 Hz is less than 0.1g. 	<p>Yes Yes Yes</p>
<p>Notes from the reviewer:</p> <p>1. The staff confirmed in the SHSR that the peak Sa in the frequency range less than 0.3 Hz is less than 0.1g (SHSR).</p> <p>Deviation(s) or Deficiency(ies), and Resolution:</p> <p>No deviations or deficiencies were identified.</p>	
<p>The NRC staff concludes:</p> <ul style="list-style-type: none"> SFP dimensions are bounded by the dimensions specified in the report (i.e. SFP length and width <125ft.; SFP depth >36ft.). The peak Sa in the frequency range less than 0.3 Hz is less than 0.1g. Applicability criteria specified in Table 3-4 of SFP evaluation guidance have been met. 	<p>Yes Yes Yes</p>

VIII. Evaporation Evaluation

<p>The licensee:</p> <ul style="list-style-type: none"> Provided the surface area of the plant's SFP. Stated that the surface area of the plant's SFP is greater than 500 ft². Provided the licensed reactor core thermal power. Stated that the reactor core thermal power is less than 4,000 MW_t per unit. 	<p>Yes Yes Yes Yes</p>
<p>Notes from the reviewer:</p> <p>1. Surface area of pool = 1,120 ft² 2. Reactor thermal power = 2,419 MW_t (UFSAR Section I-1.1);</p>	

Deviation(s) or Deficiency(ies), and Resolution:	
No deviations or deficiencies were identified.	
The NRC staff concludes:	
<ul style="list-style-type: none"> • The surface area of the plant's SFP is greater than 500 ft². • The reactor core thermal power is less than 4,000 MW_t per unit. • Applicability criteria specified in Table 3-4 of SFP evaluation guidance have been met. 	<p>Yes</p> <p>Yes</p> <p>Yes</p>

Conclusions:

The NRC staff reviewed NPPD's SFP evaluation report. Based on its review, the NRC staff concludes that the licensee's implementation of the SFP integrity evaluation met the criteria of the SFP Evaluation Guidance Report for Cooper and therefore NPPD responded appropriately to Item 9 in Enclosure 1 of the 50.54(f) letter.

COOPER NUCLEAR STATION - STAFF REVIEW OF SPENT FUEL POOL EVALUATION
 ASSOCIATED WITH REEVALUATED SEISMIC HAZARD IMPLEMENTING NEAR-TERM
 TASK FORCE RECOMMENDATION 2.1 DATED MARCH 3, 2017

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