



Nebraska Public Power District

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NLS2017038
April 17, 2017

50.54(q)

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

Subject: Emergency Plan Implementing Procedures
Cooper Nuclear Station, Docket No. 50-298, License No. DPR-46

Dear Sir or Madam:

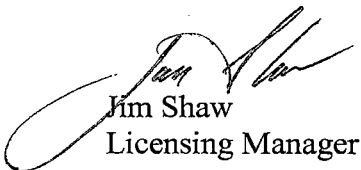
The purpose of this letter is to report a change to the following Emergency Plan Implementing Procedures (EPIP) and provide a summary of the associated 10 CFR 50.54(q) analysis for the changes to the EPIPs:

EPIP 5.7.1	Revision 57	Emergency Classification
EPIP 5.7.17	Revision 49	CNS-Dose Assessment
EPIP 5.7.17.1	Revision 3	Dose Assessment (Manual)

This letter contains no commitments.

If you have any questions regarding this submittal, please contact me at (402) 825-2788.

Sincerely,



Jim Shaw
Licensing Manager

/bk

Attachment: Report of Change and Summary of 50.54(q) Analysis
Emergency Plan Implementing Procedure 5.7.1, Revision 57
Emergency Plan Implementing Procedure 5.7.17, Revision 49
Emergency Plan Implementing Procedure 5.7.17.1, Revision 3

Enclosures: 1. Emergency Plan Implementing Procedure 5.7.1, Revision 57
2. Emergency Plan Implementing Procedure 5.7.17, Revision 49
3. Emergency Plan Implementing Procedure 5.7.17.1, Revision 3

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MER

cc: Regional Administrator, w/ attachment and enclosures (2)
USNRC – Region IV

Director, Spent Fuel Project Office, w/ attachment and enclosures
Office of Nuclear Material Safety and Safeguards

Senior Resident Inspector, w/ attachment (enclosures per controlled document distribution)
USNRC – CNS

NPG Distribution, w/ attachment and w/o enclosures

CNS Records, w/ attachment and w/o enclosures

Attachment

Report of Change and Summary of 50.54(q) Analysis Emergency Plan Implementing Procedure 5.7.1, Revision 57 Emergency Plan Implementing Procedure 5.7.17, Revision 49 Emergency Plan Implementing Procedure 5.7.17.1, Revision 3

Change Description

The following changes were made to Emergency Plan Implementing Procedure (EPIP) 5.7.1, Classification:

- In Attachment 3 (Fuel Clad; A. RPV Level and Cooper Nuclear Station (CNS) Basis section) clarified the minimum core steam flow requirement of greater than 800,000 lbm/hr. A conforming change was also made to the associated Emergency Action Level (EAL) classification matrix hard card.
- In Attachment 3 (Reactor Coolant System; D. ERD), deleted statement in the Nuclear Energy Institute (NEI) 99-01 Basis section for keeping the Safety Relief Valves (SRV) open during emergency Reactor Pressure Vessel (RPV) depressurization. Also, added supporting discussion in the CNS Basis section for closing the SRVs under certain conditions.
- In Attachment 3 (Primary Containment; A. RPV Level), revised both the NEI 99-01 Basis and CNS Basis sections to clarify Severe Accident Guideline (SAG) entry and the minimum core steam flow requirement of greater than 800,000 lbm/hr.
- References to associated Emergency Preparedness Frequently Asked Questions (EP FAQ) 2015-003 and 2015-004 and Boiling Water Reactor Owners Group (BWROG) Emergency Procedure Guidelines (EPG) and SAG, Revision 3, were also added.

The following change was made to EPIP 5.7.17, CNS-DOSE Assessment:

- In Attachment 5 (Step 1.3.2, Failure to Scram), clarified the minimum core steam flow requirement of greater than 800,000 lbm/hr.

The following change was made to EPIP 5.7.17.1, Dose Assessment (Manual):

- In Attachment 8 (Step 1.3.2, Failure to Scram), clarified the minimum core steam flow requirement of greater than 800,000 lbm/hr.

Change Summary of Analysis (10 CFR 50.54(q) evaluation)

One 10 CFR 50.54(q) analysis was performed for the three EPIP revisions since they were conforming changes being made to better align with BWROG EPG, Revision 3, and EP FAQs 2015-003 and 2015-004. This analysis is summarized below:

Licensing Basis Affected by Change:

CNS Emergency Plan (E-Plan), Section 4, discusses, in part, that CNS maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant Operators that an EAL has been exceeded and shall promptly declare the emergency condition as soon as possible following identification of the appropriate emergency classification level. This section further references NEI 99-01, Revision 5, and the CNS Updated Safety Analysis Report, Chapter XIV, as documents utilized in development of the four emergency classifications and that EALs and corresponding classifications are included in EPIP 5.7.1.

E-Plan, Section 6.3.3, discusses that CNS has the capability of performing dose projections during a radiological emergency using two separate techniques. The section provides additional description of the dose assessment methods, CNS-DOSE (computerized) and hand calculation (manual), and further discussion on the field monitoring teams.

The changes made to the EIPs do not impact methods described in the E-Plan.

How Change Complies with Regulations and Previous Commitments:

10 CFR 50.47(b)(4), requires that a standard emergency classification and action level scheme, the basis of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

10 CFR 50.47(b)(9), requires that adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

10 CFR 50, Appendix E, Section IV.B.1, requires that the means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including EALs that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the EALs that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety.

10 CFR 50, Appendix E, Section, IV.C.2, requires that by June 2012, nuclear power reactor licensees shall establish and maintain the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators than an EAL has been exceeded and shall promptly declare the emergency condition as soon as possible following identification of the appropriate emergency classification level.

The changes to the EIPs do not impact compliance with the above regulations.

Three relevant regulatory commitments were reviewed for impact; two were associated with dose assessment and determining degraded core status and the other pertained to clarification of cladding damage criterion. These commitments were not affected by the changes to the EIPs.

Affected Emergency Planning Functions/Impact on Effectiveness of Emergency Planning Functions:

10 CFR 50.47(b)(4); Function - A standard scheme of emergency classification and action levels is in use.

10 CFR 50.47(b)(9); Function - Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

The changes made to EPIPs 5.7.1, 5.7.17, and 5.7.17.1, are in alignment with the BWROG EPG/SAG (Revision 3) and NEI guidance and can be readily implemented when needed. The changes do not negatively impact accuracy or timeliness of classification or dose assessment. The changes meet the above planning standards and do not represent a reduction in the effectiveness of the CNS E-Plan.