## Nebraska Public Power District

COOPER NUCLEAR STATION P.O. BOX 98, BROWNVILLE, NEBRASKA 68321 TELEPHONE (402) 825-3811

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October 22, 1980

Mr. Darrell G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject: BWR Scram System

Reference: D. G. Eisenhut Letter to All BWR Licensees dated October 1, 1980

Dear Sir:

We concur that modifications are required for long-term scram system reliability. The reference letter acknowledged that the BWR Owner's have formed a Subgroup to develop design and performance criteria fo. hardware and procedural changes needed to assure adequate long-term scram system reliability. We were requested to inform you in writing, under oath or affirmation, within 25 days of the date of the letter as to our plans for participation in this effort. We do plan to participate in this effort. We have reviewed and concur with the criteria that was to be presented to NRC via the Owner's Group Chairman (D. W. Waters) on October 7, 1980.

We were also requested to respond to three additional items as per the reference letter. Following is our response to these items:

- A total detailed reassessment of our present scram system with respect to conformance with the GENERAL DESIGN CRITERIA (Appendix A to 10CFR50) has not been performed. The present scram system is considered to be within the boundaries set forth in the GENERAL DESIGN CRITERIA as described in the CNS FSAR Appendix F. Future modifications of the present scram system will include a unique evaluation with respect to the GENERAL DESIGN CRITERIA (Appendix A to 10CFR50).
- 2. A review of the BWR Owner's Group criteria pertaining to the scram discharge volume has been completed. The stated criteria are acceptable as written and a reevaluation of our present scram system will be performed. Secondly, any modifications which are determined to be required as a result of this reevaluation will be implemented.

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 We intend on providing by December 15, 1980, the results of the reevaluation including required modifications and a schedule for implementation.

If there are any questions concerning the above response, contact L. Lessor at Cooper Nuclear Station.

Sincerely,

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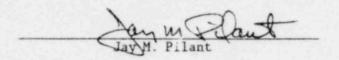
J. M. Pilant Director of Licensing and Quality Assurance

JMP:LCL:cg

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STATE OF NEBRASKA ) )ss PLATTE COUNTY )

Jay M. Pilant, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this information on behalf of Nebraska Public Power District; and that the statements in said application are true to the best of his knowledge and belief.



Subscribed in my presence and sworn to before me this 22 day of detoder , 1980.

Marilyn R. Hohndorf NOTARY PUBLIC

My Commission expires Oct. 14, 1984

