

Nebraska Public Power District

GENERAL OFFICE
P. O. BOX 499, COLUMBUS, NEBRASKA 68601
TELEPHONE (402) 564-8561

LQA8100048

February 27, 1981

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Revised Response to NUREG-0737
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

Reference: 1) Letter from J. M. Pilant to D. G. Eisenhut
Dated December 30, 1980, "Post TMI-
Requirements/Action Plan"

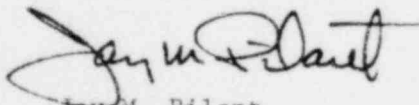
Dear Mr. Eisenhut:

Reference 1 submitted the responses and commitments as required by NUREG-0737 "Clarification of TMI Action Plan Requirements". The District was informed by the staff on February 20, 1981 that five of the responses were judged as not containing the necessary commitments, information, etc.

Enclosure 1 contains the District's revised responses to these items which address the staff's concerns and which are felt to be fully responsive to the requirements of NUREG-0737.

If additional clarification on any item is necessary, please contact me.

Sincerely,



Jay M. Pilant
Director of Licensing
and Quality Assurance

JMP:JDW:cmk

Enclosure



8108050 493

A046
S
1/1

NEBRASKA PUBLIC POWER DISTRICT
COOPER NUCLEAR STATION
NUREG 0737 IMPLEMENTATION
REVISED RESPONSES PER STAFF REQUEST

Action Plan Item

I.C.6 - Procedures for Verifying
Correct Performance of
Operating Activities

The applicable Cooper Nuclear Station procedures have been reviewed and per the guidance in NUREG-0737, it has been assured that an effective system of verifying the correct performance of operating activities is provided.

II.B.3(P) - Postaccident Sampling

A preliminary copy of the proposed design change describing the equipment installation for the postaccident sampling system has been received from the architect-engineer, and is currently being evaluated. Deviations, if any, from the NRC position will be submitted at a later date. It is intended to complete the modifications by January 1, 1982.

II.F.1(P) - Accident Monitoring
Instrumentation

The preliminary copy of the proposed design change describing the equipment installation for the noble gas monitoring system has been received from the architect-engineer and is currently being evaluated. The Iodine/Particulate sampling system design specification has not as yet been drafted. It is, however, in preparation by the architect-engineer.

We do not anticipate that our installation of these two items will deviate from the NRC position stated in NUREG 0737. It is intended to complete the installation by January 1, 1982.

II.K.3.3 - Report MSV and MSRV
Failures and Challenges

The required information will be included in the annual report which is required by the CNS Technical Specifications. This annual report will be submitted March 1, 1981.

II.K.3.27 - Common Reference Level
for Vessel Level
Instrumentation

Based upon the GE-BWR Owners' Group report forwarded to the NRC by General Electric, and existing operating procedures and past experience, the District initially concluded that the currently installed reactor vessel level instrumentation system is adequate and that no changes would be made. However, upon receipt of the staff's rejection of this position, the District has further reviewed the common reference for vessel level instrumentation issue, and it has been concluded that

II.K.3.27 - (continued)

the existing level instrumentation will display some additional information (e.g., a red line or marker plate) that references the existing scale on each indicator or recorder to the top of active fuel (TAF) as required by NUREG 0737. We do not, however, believe it prudent from a human factors engineering viewpoint, to change out the existing scales; to change the safety system operating and surveillance procedures that are based upon those existing scales; to change the Technical Specification operating and safety limits; and to change vendor's manuals, drawings, training manuals, etc. Changing all of these at this point (after approximately 7 years of operation) would require each operator to reorient himself to the new scales and corresponding alarm levels, trip levels, etc. The District believes that this could confuse operators and result in a degradation of safety that is not warranted.

Therefore, by 7-1-81, The District will add red lines and appropriate marker plates on each fuel zone indicator or recorder to indicate the TAF (Top of Active Fuel) under both instrument calibration conditions and under the normal operating temperature and pressure condition. Additionally, for indicators and recorders that provide level information above the fuel zone, a marker plate will be put either below the indicator or to the left of a recorder that indicates how far the bottom of the scale is from the TAF. These modifications will meet the NUREG 0737 requirement that all level instruments be referenced to the same point.