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September 6, 1982

U.S. Nuclear Regulatory Commission Attention: Darrell G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation Washington, DC 20555

Subject: Response to Recombiner Requirements in the Final Interim Hydrogen Control Rule

Reference: 1) "Interim Requirements Related to Hydrogen Control", Final Rule, published in <u>Federal Register</u>, Vol. 46, No. 231, pp. 58484-58486

> Letter from T. J. Dente (BWR Owners Group) to D. G. Eisenhut, dated August 12, 1982, same subject

Dear Mr. Eisenhut:

Reference 1 requires that Mark I plants such as Cooper Nuclear Station which rely on purge/repressurization as the primary means of hydrogen control be provided with either an internal hydrogen recombiner or the capability to install an external recombiner following an accident. In Reference 2, the BWR Owners Group submitted a technical evaluation which determined that the installation of hydrogen recombiner capability is not necessary for combustible gas control at Cooper Nuclear Station since the existing inerted containment design is adequate for control of combustible gases without the need for recombiners or containment venting. In a meeting with the Staff, July 21, 1982, affected licensees were advised to independently reply to the NRC stating their compliance with the rule and that no additional utility action towards implementation was necessary until this issue is resolved.

This letter 's written to inform the NRC that Nebraska Public Power District will continue to participate in resolution of this issue with the BWR Owners Group and that no additional actions toward implementation of the rule are being pursued at this time. If our position on this issue is not acceptable, please inform me.

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Sincerely,

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Jay M. Pilant Division Manager of Licensing and Quality Assurance

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