Nebraska Public Power District

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March 14, 1991

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Submittal of Additional Information Regarding NRC Generic Letter 89-04, Guidance on Developing Acceptable Inservice Testing Programs
Cooper Nuclear Station
NRC Docket No. 50-298, License No. DPR-46

References:

1) L. C. Kuncl to U.S. NRC Document Control Desk, September 26, 1989, Submittal of Confirmatory Letter to NRC Generic Letter 89-04.

2) J. M. Pilant to Darrell Eisehut, dated March 17, 1980, LWR Primary Coolant System Pressure Isolation Valves

3) G. A. Trevors to U.S. NRC Document Control Desk, May 25, 1990, Cooper Nuclear Station Inservice Testing Program Plan, Revision 6, Submittal

Gentlemen:

This letter provides additional information concerning the Reference (1) submittal in response to NRC Generic Letter Number 89-04 regarding the development of an acceptable Inservice Testing (IST) program. The NRC Project Manager for Cooper Nuclear Station requested additional confirmation of the District's conformance to the various staff positions contained in Generic Letter 89-04 and of the District's implementation of these positions in the CNS IST program. This confirmation is provided below.

The CNS IST program conforms to the staff positions stated in Generic Letter 89-04 with the following considerations:

1. Position 4 of the Generic Letter addressed Pressure Isolation Valves listed in plant Technical Specifications and Event V Pressure Isolation Valves. The District stated in Reference (1) that the CNS Technical Specifications do not list or designate any pressure isolation valves and in Reference (2) the District stated that no Event V pressure isolation valve configurations were identified at CNS. Therefore, this position does not address a situation that is applicable to CNS.

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2. Position 9 of the Generic Letter concerned pump testing using minimum flow return lines with or without flow measuring devices. The District does not utilize minimum flow return lines in performing Inservice Testing at CNS. Larger diameter piping is used in the flow path during testing to demonstrate pump capacity. Therefore, the District does not utilize the alternate pump testing method allowed by this staff position.

The staff positions to Generic Letter 89-04, subject to the above considerations, have been incorporated into the CNS IST Program and its implementing procedures. The District in its Reference (1) submittal included a schedule, which has been completed, for implementing the positions of Generic Letter 89-04 to upgrade the CNS IST Program during 1990. Specifically, the following actions have been taken to upgrade the CNS IST Program:

1. A revised IST Program Plan submitted to the NRC by Reference (3).

2. CNS IST Program related surveillance test procedures have been revised to reflect the positions outlined in the generic letter.

3. New testing identified as a result of Generic Letter 89-04 positions and which is required to be performed during refueling outages was performed during the Spring 1990 refueling outage.

4. The acceptance criteria in the test procedures for the limiting values of full-stroke times for all power-operated valves in the program that require stroke time measurements have been reviewed and implementing test procedures revised as necessary using the guidelines specified in Position 5.

5. Administrative directives are in place to implement the requirement to immediately declare components inoperable when IST limits are exceeded as specified in Position 8.

6. The testing requirements of the revised CNS IST Program have been fully incorporated into the implementing test procedures.

Should you have any questions or require any additional information regarding the CNS IST Program, please contact J. R. Flaherty, the Engineering Manager for CNS.

Sincerely,

G. R. Horn
Nuclear Power Group Manager

GRH/mad:sm

cc: NRC Regional Office
Region IV
Arlington, TX

NRC Resident Inspector
Cooper Nuclear Station