

Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68602-0499
TELEPHONE (402) 564-8561
FAX (402) 563-5551

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January 31, 1992

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

Subject: Generic Letter 88-20, Individual Plant Examination for Severe
Accident Vulnerabilities - 10CFR50.54(f), Progress Update
Cooper Nuclear Station
Docket No. 50-298, DPR-46

- References:
- 1) Individual Plant Examination for Severe Accident Vulnerabilities - 10CFR50.54(f), Generic Letter 88-20, dated November 23, 1988
 - 2) Letter from L. G. Kunc1 (NPPD) to U.S. NRC Document Control Desk dated October 31, 1989; Subject: Response to Generic Letter 88-20
 - 3) Letter from G. R. Horn (NPPD) to U.S. NRC Document Control Desk, dated June 27, 1991; Subject: Request for Extension, Individual Plant Examination for CNS
 - 4) Record of Telephone Conversation between P. W. O'Connor (NRC-NRR) and G. R. Smith (NPPD) dated October 8, 1991; Subject: Generic Letter 88-20 (IPE) Due Date Extension

Gentlemen:

The Nuclear Regulatory Commission (NRC) requested in Reference 1, pursuant to 10 CFR 50.54(f), that licensees perform an Individual Plant Examination (IPE) to identify any plant-specific vulnerabilities to severe accidents and submit the results to the NRC. In response to Reference 1, and subsequent associated supplements, the Nebraska Public Power District (District) committed (Reference 2) to perform an IPE for the Cooper Nuclear Station (CNS). In Reference 3, the District requested, and was granted (Reference 4), a revised completion date of August 1992 (NRC specified completion date) for the completion of the IPE. The District also committed, in Reference 3, to provide an update of its progress by January 31, 1992. In accordance with Reference 3, this letter provides an update of the District's progress towards the completion of the IPE for CNS.

The District has completed the quantification of the Level I model of the Probabilistic Risk Assessment (PRA) and is currently working on the integration and review of the Level I PRA documentation. The District also initiated the appropriate initial elements of the Level II PRA portion of the IPE in November 1991.

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The District continues to work towards the August 1992 IPE completion date. However, the District has experienced several schedule setbacks since its last correspondence (Reference 3). These setbacks include, in part, a shortage of qualified contractor personnel and the increased amount of time and difficulty associated with the technology transfer. In response, District management has taken a proactive role in providing solutions that will assure the quality and help regain schedular commitments of the IPE effort. The following is a discussion of some of the actions implemented.

- * The authorization of funds to obtain additional staff augmentation personnel. Overtime has also been authorized to improve achievement of various schedule milestones.
- * A dedicated District engineer to assist the PRA group in developing and implementing procedures and techniques for developing, tracking, testing, and maintaining the numerous computer data files and codes needed to support the severe accident effort.
- * Assignment of a dedicated District Engineer to augment the PRA staff in the area of thermal-hydraulics analysis.
- * The acquisition of additional drafting support.
- * The PRA group administrative equipment continues to be upgraded to the most up-to-date tools for completion of the project in the most timely and efficient manner possible. These tools include high speed computers, optical storage drives, dedicated uninterruptible power supplies, and sophisticated software.

District management, as you can see, is taking a proactive role in its effort to shorten the amount of time required to accomplish individual tasks in the IPE project. In addition to the increased amount of District resources dedicated to the IPE effort, the District maintains weekly communications with the District's IPE contractors to, in part, coordinate and emphasize the need to meet schedular commitments. Because industry resources are stretched very thin and consulting services for PRA contractor work are not always available, it is unlikely that the District will be able to shorten the current schedule, where dependence on the contractors is necessary.

In References 2 and 3, the District committed to an effective and beneficial internal review process, the maintenance of a high level of District engineering and operations personnel involvement, while maintaining the documentation integrity of the IPE process; thus allowing the IPE/PRA results to be used as a living document. To date, District management, engineering, and operations all have been involved in various aspects of the IPE process. This involvement has contributed, significantly, to the effective transfer of technology to District personnel, the ability to use the IPE process to evaluate significant engineering issues, and the effective allocation of District resources towards the IPE effort.

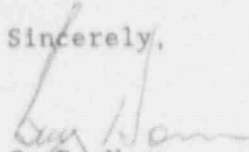
In summary, the District is currently taking several actions to accomplish the timely completion of the IPE for CNS. The District, however, is aware that there are many factors, some yet to be determined, that may lengthen the amount of time necessary to complete the IPE project. Although the District will continue to make every effort to meet the August 1992 completion date, we believe you will

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agree the complexity of this project has continued to increase throughout the industry, thus increasing the effort required. The District is also of the opinion that the importance, required validity, and ultimate use of the IPE results require the level of effort currently being taken by the District. We intend to keep you appraised of our progress and, if found necessary, request an appropriate schedule extension for the completion of the Level II effort.

If you have any questions or comments, please contact this office.

Sincerely,



G. R. Horn
Nuclear Power
Group Manager

GRH/dnm

cc: U.S. Nuclear Regulatory Commission
Region IV
Arlington, TX

NRC Resident Inspector
Cooper Nuclear Station