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Nebraska Public Power District

NSD920108 January 31, 1992

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

Subject: Response to NRC Generic Letter 91-11 Resolution of Generic Issues 48, "LCO's for Class 1E Vital Instrument Buses," and 49, "Interlocks and LCO's for Class 1E Tie Breakers" Cooper Nuclear Station NRC Docket No. 50-298, DPR-46

Gentlemen:

NRC Generic Letter (GL) 91-11, "LCO's for Class lE Vital Instrument Buses and Interlocks and LCO's for Class lE Tie Breakers", was issued on July 18, 1991 and received by Nebraska Public Power District (District) on August 5, 1991. The Generic Letter contained recommended actions for the Resolution of Generic Issues 48 ("LCO's for Class 1E Vital Instrument Buses"), and 49 (Interlocks and LCO's for Class 1E Tie Breakers").

As requested in the Generic Letter. (See District has investigated and ensured that the Cooper Nuclear Station (Cr3), recedures address time limitations and surveillance requirements for vital instrumentation buses, and inverters or other onsite power sources that supply the vital instrument buses (Generic Issue 48). In addition the District has investigated the vital instrument buses and redundant Class 1E buses relative to problems which could be created by the tie breakers. We have verified that CNS has no tie breakers of the type discussed in the Generic Letter, as clarified by the attached telephonic conversation with the NRC staff, that can connect normally independent, redundant Class 1E AC and DC buses. As such, the concerns of Generic Letter 91-11 do not apply to Cooper Nuclear Station.

This response is submitted under oath in accordance with the provisions of 10CFR50.54(f).

erful Pride in Nebraska

Please contact us if you have any questions.

Singerely,

NOn G. (R.) Horn Nuclear Power Group Manager

GRS:tja:GL91-11.res Attachment

cc: Regional Administrator USNRC - Region IV

> NRC Resident Inspector Cooper Nuclear Station

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STATE OF NEBRASKA)) ss PLATTE COUNTY)

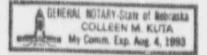
G. R. Horn, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this information on behalf of Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.

G. R. Horn

Subscribed in my presence and sworn to before me ... is 312t day of

anuary , 1992. Dow M Kuto

NOTARY PUB



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NEBRASKA PUBLIC POWER DISTRICT

RECORD OF TELEPHONE CONVERSATION

Sheet _1_ of _1__ Date _JAN 9, 1992 Time _0930 CST

PROM: Name: R. Poust, R. Moberty, M. Dean		TO: Name: O. Chopra
Company: NPPD - CNS		Company: NRC - Washington, DC
SUBJECT: 0	ioneric Letter 91-11 - Divisional Bus Th	8/eakers at CNS (NSD#20009)
TOPICS OF	CONVERSATION	
term is used		mation to aid in determining If CNS had bus tie breakers as that listed as the NRC information contact in the Generic Letter.)
Qi	In regards to the definition of bus tie breaker, the CNS configuration has divisional DC panels and AC MCCs that can be transferred from 1 of 2 divisions to the other divisional power source using a single transfer switch. This is normally done during plant outages. This does not allow both DC divisions to connected together at the same time.	
		Read IIMM
A:	Because this configuration cannot the two redundent busses togother at the same time, this would not be considered to be a bus the breaker [as used in the Generic Letter].	
Q:	In the 125 VDC battery systems, CNS can place the "A" bus on the "B" battery. This is done with a single transfer switch.	
A	This is not in the same category of the breakers that we are concerned about in this Generic Letter.	
Q;	CNS can also transfer loads on an "A" [125 VDC] panel to the "B" battery bus. In this case, all of the "A" divisional loads for that panel would then be on the "B" divisional bus. This is done with a transfer switch for that panel.	
		drawing of this example be sont to him so that he could e sent to him, and he called Rick later in the day.]
A:	This is not a configuration to which the	he concerns of the Generic Letter apply.
Michael A. De Nuclear Lloen	and the second s	

DISTRIBUTION:

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