



Nebraska Public Power District

COOPER NUCLEAR STATION
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321
TELEPHONE (402)825-3811
FAX (402)825-5211

NLS950099
October 18, 1995

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Clarification of Control Rod Mobility Testing Methodology Contained in Startup Physics Testing Summary Submittals

- References:
1. Letter from G. R. Horn to Document Control Desk, dated September 20, 1993, regarding the completion of Startup Physics Testing
 2. Letter from T. A. Ippolito to J. M. Pilant dated March 13, 1979, regarding a request for additional information concerning the Cooper Nuclear Station (CNS) Cycle 5 reload

Dear Sir,

In keeping with its objective of providing clear and consistent information to the NRC, the Nebraska Public Power District (the District) has identified an example of submitted information that could potentially be misconstrued. In compliance with reference 2, CNS has been performing control rod withdrawal and insertion mobility checks as part of Startup Physics Testing. Since Reload 4, Cycle 5 in 1979, the District has submitted a Startup Physics Testing letter to the NRC which typically has included a discussion describing CNS compliance with the control rod mobility checks (see reference 1 as an example). The wording in the submittals leaves the impression that a mobility check will be performed prior to loading the next fuel bundle. In fact, it is only after the entire core is loaded that the control rod mobility checks are performed. This methodology is in keeping with the standard industry practice of performing this testing following core verification.

This issue was verbally communicated to Messrs. Phil Harrell and Terry Reis of NRC Region IV on April 4, 1995, by the CNS Nuclear Licensing and Safety Manager. Investigations have revealed that Sections 1, 2, and 3 of the associated attachments were recopied from submittal to submittal without critical review, most likely because the information regarding the Purpose, Description, and Criteria and Actions do not change between tests. A validation was performed for the remaining information, which was determined to be accurate and clear.

In reviewing this matter, it does not appear to have been the NRC's intent that Startup Physics Testing completion letters be submitted on a routine basis. Accordingly, the District intends to discontinue the submittal. The NRC should consider the Startup Physics Testing process to be

9510260105 951018
PDR ADOCK 05000298
P PDR

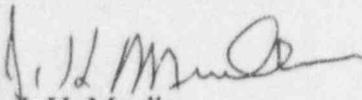
A001
11

NLS950099
October 18, 1995
Page 2 of 2

identical from cycle to cycle. However, the District will provide a Startup Physics Testing completion letter for any future refueling cycle where there is a change in the information that has been included in the previous submittal.

The District apologizes for any confusion this may have caused. Should you have any questions concerning this matter, please contact my office.

Sincerely yours,



J. H. Mueller
Site Manager

cc: Regional Administrator
USNRC - Region IV

NRC NRR Project Manager
USNRC

NRC Resident Inspector
Cooper Nuclear Station

NPG Distribution

