



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS970091
May 2, 1997

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

Subject: Confirmation of Commitment
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

During a conference call (Safety Relief Valves (SRVs), 09:00 CDT, April 30, 1997), you requested that Nebraska Public Power District (District) confirm on the docket the commitment to a mid-cycle shutdown at Cooper Nuclear Station to ensure SRV performance is meeting Technical Specification limits. This letter confirms the District's commitment to this action.

Data obtained during the previous refueling outage (RE-16) indicated that, after nine (9) months of operation, the four (4) SRVs with new Platinum-Stellite pilot discs all performed within the Proposed CNS Improved Technical Specification (ITS) tolerance of +/- 3%. Three of the SRVs performed within the current Technical Specification (TS) Safety Setting limits of +/- 1%, with the fourth valve exceeding the TS setpoint by +2.4%.

Data obtained during the current refueling outage (RE-17) indicates that three of the four valves with Platinum-Stellite discs and with service times ranging from fifteen to twenty-four months exceeded the TS setpoint by less than +4.0%. The fourth SRV with a Platinum-Stellite disc exceeded setpoint by 8.72%.

Based on the past performance of SRVs with 0.3% Platinum-Stellite pilot discs, the District has reasonable confidence that SRVs refurbished with new discs will perform within the Technical Specification Safety Setting limits of the ITS submittal for a period not to exceed approximately ten and one half (10.5) months. The 10.5 month period is based on a linear extrapolation of the data for the worst performing Platinum-Stellite disc (2.4% over setpoint), after nine (9) months of service. This linear extrapolation shows that at 10.5 months, this worst performing SRV would have been less than 3% over the Tech Spec setpoint, with a small margin. Also, by assuming a linear extrapolation of the data for the other three Platinum-Stellite disc SRVs out to their performance after an additional fifteen (15) months of service, none of the valves would have exceeded 3% over the setpoint at 10.5 months.

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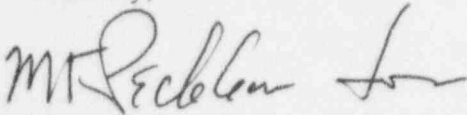
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The District is currently refurbishing all eight SRVs with new Platinum-Stellite pilot discs prior to reinstalling the valves for the upcoming cycle. The District is also pursuing a TS change to expand the tolerance of the Safety Setting limit for the SRV setpoint to +/- 3%. These actions provide the District with a high level of confidence that the SRVs will perform within TS limits for the ten and one half month period. The District will continue to monitor the industry's efforts to resolve the SRV setpoint drift issue and implement appropriate actions during the mid-cycle shutdown. The shutdown will occur during a window that ensures the valves will be in service for no longer than the above specified period.

Should you have any questions concerning this matter, please contact me.

Sincerely,



P. D. Graham

Vice President of Nuclear Energy

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cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

