

Nebraska Public Power District

Nebraska's Energy Leader

NLS980158

September 23, 1998

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

Subject: Completion of Regulatory Guide 1.97 Commitments
Cooper Nuclear Station, NRC Docket No. 50-298, DPR-46

- Reference:
1. Letter from Harry Rood (USNRC) to G. R. Horn (NPPD) dated April 4, 1993, "Regulatory Guide 1.97- Boiling Water Reactor Neutron Flux Monitoring- Cooper Nuclear Station (TAC No. M51082)"
 2. Letter NSD930697 to USNRC from G. R. Horn (NPPD) dated June 7, 1993, "Cooper Nuclear Station Compliance with NEDO-31558, Position on NRC Regulatory Guide 1.97, Revision 3, Requirements for Post-Accident Neutron Monitoring System"
 3. Letter NLS950213 to USNRC from J. H. Mueller (NPPD) dated December 4, 1995, "Cooper Nuclear Station Compliance with NEDO-31558, Position on NRC Regulatory Guide 1.97, Revision 3, Requirements for Post-Accident Neutron Monitoring System"
 4. USNRC Generic Letter 94-02, dated July 11, 1994, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors"
 5. Letter NLS960173 to USNRC from P. D. Graham (NPPD) dated September 13, 1996, "Revision of Commitment, Cooper Nuclear Station, NRC Docket 50-298, DPR-46"
 6. Letter from J. R. Hall (USNRC) to G. R. Horn (NPPD) dated October 17, 1996, "Regulatory Guide 1.97- Boiling Water Reactor Neutron Flux Monitoring- Cooper Nuclear Station (TAC No. M51082)"

Gentlemen:

By letter dated April 4, 1993 (Reference 1), the NRC requested the Nebraska Public Power District (District) to review the neutron flux monitoring instrumentation of Cooper Nuclear

Cooper Nuclear Station

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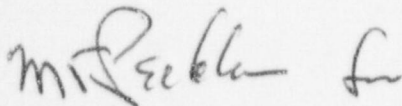
Station (CNS) against the criteria of NEDO-31558, "Position on NRC Regulatory Guide 1.97, Revision 3, Requirements for Post-Accident Neutron Monitoring System" to determine whether CNS meets the NEDO-31558 criteria, and provide a letter to the NRC documenting the results of the review. By letter dated June 7, 1993 (Reference 2), CNS informed the NRC of the completion of its review of the existing neutron monitoring system (NMS) against the alternate functional design criteria listed in Section 5 of NEDO-31558, and committed therein a plant-specific evaluation and any resulting modification prior to next refueling outage (RE 16). The two commitments (Reference 2) made by the District were: to evaluate the criteria for Equipment Qualification, and Function Time; and to complete the required modifications to relocate the average power range monitors (APRMs) and local power range monitors (LPRMs) card power sources to two redundant uninterruptible power sources to conform with the guidance of NEDO-31558.

By letter dated December 4, 1995 (Reference 3), the District informed the NRC of its plan to defer the commitment made in Reference 2 concerning modification to relocate the APRM and LPRM card power sources until the next refueling outage (RE 17). This deferment was to facilitate a coordination between the power sources' modification and the planned changes to the NMS to address thermal-hydraulic instabilities in accordance with Generic Letter 94-02 (Reference 4). By letter dated September 13, 1996 (Reference 5), the District stated to the NRC that it is in compliance with the requirements of Paragraph 5.2.8 of NEDO-31558, concerning the APRM and LPRM card power sources, and thereby retracted the related commitment made in Reference 2. By letter dated October 17, 1996 (Reference 6), the NRC accepted the District's justification for being in compliance for Power Source Criterion of NEDO-31558.

For the remaining commitment, the District performed a plant-specific evaluation of Anticipated Transient Without Scram environment on NMS equipment to assure that there are no unique features or configurations that would not conform to the assumptions used in NEDO-31558. This evaluation determined that all the components evaluated meet the criteria of NEDO-31558. This letter is to notify the NRC that all the commitments made in References 2 and 3 have been fulfilled.

Should you have any questions or comments, please contact me.

Sincerely,



John H. Swailes
Vice President of Nuclear Energy

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cc: Regional Administrator w/attachment
USNRC Region IV

NRC Resident Inspector w/attachment
Cooper Nuclear Station

Project Manager - Cooper w/attachment
USNRC - NRR

NPG Distribution w/o attachment

Correspondence No: NLS980158

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
None	