

## Nebraska Public Power District

GENERAL OFFICE  
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499  
TELEPHONE (402) 564-8561

NLS8800486  
October 7, 1988

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

Gentlemen:

Subject: Response to Generic SER for Unresolved Safety Issue A-46  
Cooper Nuclear Station  
NRC Docket No. 50-298, DPR-46

- Reference:
- 1) Letter from Mr. Lawrence C. Shao (NRC) to Mr. Neil P. Smith (SQUG) dated July 29, 1988
  - 2) Letter from Mr. Neil P. Smith to Mr. Lawrence C. Shao, dated August 19, 1988
  - 3) Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46

In Reference 1, the NRC issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedures (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the Seismic Qualification Utility Group (SQUG). Reference 1 also requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. SQUG clarified, in Reference 2, that the sixty days would expire on October 7, 1988. This letter provides the current plant-specific seismic verification plans for Cooper Nuclear Station, consistent with the requirements of Reference 3.

As a member of SQUG, the District has supported the many efforts on which the GIP is based. The SER endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG and its contractors is underway to resolve the identified open issues and comments in accordance with the SQUG schedule presented at the August 10-11, 1988, meeting with the NRC staff and included with the SQUG letter to Mr. L. Shao dated August 19, 1988. This schedule projects completion of Revision 2 of the GIP in Spring, 1989, contingent upon SQUG and NRC agreement on the resolution of the various open issues. Revision 2 of the GIP is the version which is scheduled to contain all of the information needed to implement the USI A-46 generic letter at SQUG member plants. The final NRC SER Supplement on Revision 2 of the GIP is anticipated by mid-1989. After receipt of the final SER Supplement, time is

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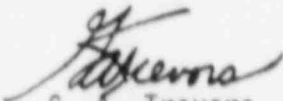
required to finalize and conduct the SQUG Training Seminars and to prepare for the plant walkdowns.

Any plans for implementation of the GIP at Cooper Nuclear Station are necessarily dependent on the schedule for completion of Revision 2 of the GIP and the NRC's SER supplement on that revision. Assuming no major changes in the workscope currently envisioned, the District plans to perform the seismic verification plant walkdown at Cooper Nuclear Station by the conclusion of the first refueling outage scheduled to commence at least 180 days after receipt of the final SER Supplement and resolution of all open issues. Identification of safe shutdown equipment, gathering of necessary plant-specific data, and training of walkdown team members will be initiated prior to this outage.

The District's implementation, as described above, will be based on the "SQUG Commitments" identified in each section of the GIP as presently written. The final scope and content of the GIP and the supplemental SER are uncertain at this time. Criteria need to be added for evaluation of cable raceways, tanks, heat exchanges, and relays. There is also the possibility of integrating the A-46 resolution with that of numerous other related seismic issues (e.g., Eastern Seismicity, Seismic Margins, and Severe Accident Individual Plant External Event Evaluations).

Discussions are ongoing between SQUG and the NRC staff to resolve the remaining technical and licensing issues. Major decisions regarding the content and the applicability of the GIP are forthcoming. In view of these uncertainties, it must be recognized that the A-46 implementation schedule given above may need to be revised. The District will keep its NRC Project Manager advised of our implementation plans and schedules.

Sincerely,



G. A. Trevors  
Division Manager  
Nuclear Support

GAT/mtb:rh30/2(12B)  
Enclosure

cc: U.S. Nuclear Regulatory Commission  
Regional Office - Region IV  
  
NRC Resident Inspector Office  
Cooper Nuclear Station