

# UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

November 25, 1992

Docket No. 50-298

Mr. Guy R. Horn Nuclear Power Group Manager Nebraska Public Power District Post Office Box 499 Columbus, Nebraska 68602-0499

Dear Mr. Horn:

SUBJECT: EVALUATION OF LICENSEE'S 120-DAY RESPONSE TO SUPPLEMENT NO. 1 TO

GENERIC LETTER 87-02 FOR COOPER NUCLEAR STATION (TAC NO. M69439)

By letter dated September 21, 1992, the Nebraska Public Power District responded to Supplement No. 1 to Generic Letter (GL) 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46," for the Cooper Nuclear Station (CNS). Enclosure 1 provides the NRC staff's evaluation of your letter.

Supplement No. 1 to GL 87-02 required that all addressees provide, within 120 days of the date of issuance of the supplement, either a commitment to use both the Seismic Qualification Utility Group (SQUG) commitments and the implementation guidance described in the Generic Implementation Procedure. Revision 2 (GIP-2), as corrected on February 14, 1992, and as supplemented by the staff's Supplemental Safety Evaluation Report No. 2 (SSER-2) on GIP-2, or else provide an alternative method for responding to GL 87-02. The supplement also required that those addressees committing to implement GIP-2 provide an implementation schedule, and provide the detailed information as to what procedures and criteria were used to generate the in-structure response spectra to be used for USI A-46. In addition, the staff requested in SSER-2 that the licensees inform the staff in the 120-day response if they intend to change their licensing basis to reflect a commitment to the USI A-46 (GIP-2) methodology for verifying the seismic adequacy of mechanical and electrical equipment, prior to receipt of the staff's plant-specific safety evaluation resolving USI m-46.

Your response is unclear as to whether or not you intend to implement both the SQUG commitments and the implementation guidance. The staff interprets your response as a commitment to the entire GIP-2 including both the SQUG commitments and the implementation guidance, and therefore considers it acceptable. If our interpretation is incorrect, then in accordance with Supplement No. 1 to GL 87-02, you should provide for staff review, as soon as practicable prior to implementation, your alternative criteria and procedures for responding to GL 87-02. Additionally, you should not merely follow the August 21, 1992, SQUG letter for implementing GIP-2 as stated in your submittal, but should refer to Enclosure 2 to this letter which provides the

nno file centen co

9212040125 921125 PDR ADOCK 05000298 PDR PDR staff's response to the SQUG letter. The implementation schedule you proposed is within the 3-year response period requested by the staff in Supplement No. 1 to GL 87-02 and is therefore acceptable. Your proposed in-structure response spectra have also been reviewed by the staff and found acceptable for use as "median centered" spectra, rather than "conservative design" spectra, as you proposed. We note that you did not indicate in your submittal that you intend to change the CNS licensing basis to reflect a commitment to the USI A-46 methodology prior to receipt of the staff's plant-specific SER.

This completes the staff review of your 120-day response to Supplement No. 1 to GL 87-02. If you have any questions concerning this issue, please contact me.

Sincerely,

ORIGINAL SIGNED BY:

Harry Rood, Senior Project Manager Project Directorate IV-1 Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation

### Enclosures:

1. Safety Evaluation

 NRC's response to SQUG letter dated October 2, 1992

cc w/enclosures: See next page

#### DISTRIBUTION:

Docket File NRC & Local PDRs PD4-1 Reading M. Virgilio J. Larkins P. Noonan ACRS (10) (P-315) OGC (15818) A. B. Beach, RIV PD4-1 Plant File H. Rood J. Roe H. Ashar P. Chen J. Gagliardo, RIV P. Sears M. McBrearty

## \*See previous concurrence

OFFICE	LA:PD4-1	PM:PD4-10	BC:EMEB*	D:PD4-1
NAME	PNoonan	HRood:pk	JNorberg	Hamkins
DATE	11 625/92	1/2/92	11/24/92	11/25/92

OFFICIAL RECORD COPY Document Name: CO069439.LTR

staff's response to the SQUG letter. The implementation schedule you proposed is within the 3-year response period requerted by the staff in Supplement No. 1 to GL 87-02 and is therefore acceptable. Your proposed in-structure response spectra have also been reviewed by the staff and found acceptable for use as "median centered" spectra, rather than "conservative design" spectra, as you proposed. We note that you did not indicate in your submittal that you intend to change the CNS licensing basis to reflect a commitment to the USI A-46 methodology prior to receipt of the staff's plant-specific SER.

This completes the staff review of your 120-day response to Supplement No. 1 to GL 87-02. If you have any questions concerning this issue, please contact me.

Sincerely,

ORIGINAL SIGNED BY:

Harry Rood, Senior Project Manager Project Directorate IV-1 Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation

## Enclosures:

1. Safety Evaluation

 NRC's response to SQUG letter dated October 2, 1992

cc w/enclosures: See next page

## DISTRIBUTION:

Docket File NRC & Local PDRs PD4-1 Reading M. Virgilio J. Larkins P. Noonan ACRS (10) (P-315) OGC (15B18) A. B. Beach, RIV PD4-1 Plant File H. Rood J. Roe P. Chen H. Ashar J. Gagliardo, RIV P. Sears M. McBrearty

## \*See previous concurrence

OFFICE	LA: PD4-1	PM: PD4-10	BC:EMEB*	D:PD4-1
NAME	PNoonan	HRood:pk	JNorberg	Harrkins
DATE	1/ /25/92	1/1/2/92	11/24/92	11/25/92

OFFICIAL RECORD COPY Document Name: CO069439.LTR

staff's response to the SQUG letter. The implementation schedule you proposed is within the 3-year response period requested by the staff in Supplement No. 1 to GL 87-02 and is therefore acceptable. Your proposed in-structure response spectra have also been reviewed by the staff and found acceptable for use as "median centered" spectra, rather than "conservative design" spectra, as you proposed. We note that you did not indicate in your submittal that you intend to change the CNS licensing basis to reflect a commitment to the USI A-46 methodology prior to receipt of the staff's plant-specific SER.

This completes the staff review of your 120-day response to Supplement No. 1 to GL 87-02. If you have any questions concerning this issue, please contact me.

Sincerely,

Harry Rold, Senior Project Manager

Project Directorate IV-1

Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation

Enclosures:

1. Safety Evaluation

 NRC's response to SQUG letter dated October 2, 1992

cc w/enclosures: See next page cc:

Mr. G. D. Watson, General Counsel Nebraska Public Power District P. O. Box 499 Columbus, Nebraska 68602-0499

Cooper Nuclear Station ATTN: Mr. John M. Meacham Site Manager P. O. Box 98 Brownville, Nebraska 68321

Randolph Wood, Director Nebraska Department of Environmental Control P. O. Box 98922 Lincoln, Nebraska 68509-8922

Mr. Richard Moody, Chairman Nemaha County Board of Commissioners Nemaha County Courthouse 1824 N Street Auburn, Nebraska 68305

Senior Resident Inspector U.S. Nuclear Regulatory Commission F. O. Box 218 Brownville, Nebraska 68321

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Mr. Harold Borchert, Director Division of Radiological Health Nebraska Department of Health 301 Centennial Mall, South P. O. Box 95007 Lincoln, Nebraska 68509-5007