



Nebraska Public Power District

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NLS2021013
April 21, 2021

50.71(e)

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

Subject: Updated Safety Analysis Report, Revision XXX
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Dear Sir or Madam:

The purpose of this letter is to submit the thirtieth revision of the Cooper Nuclear Station (CNS) Updated Safety Analysis Report (USAR), in accordance with the provisions of 10 CFR 50.71(e). This revision covers the reporting cycle from February 23, 2019, through February 22, 2021.

This revision is being submitted electronically on CD-ROM on a total replacement basis. Changes made during this reporting cycle can be identified by page revision dates during the time period noted above, along with corresponding revision bars. Attachment 1 provides a listing of the document components included on each of the six enclosed CD-ROMs.

The following documents are incorporated in the USAR by reference and do not have a separate regulatory requirement for reporting of changes. Therefore, updated versions of these documents are provided on the enclosed CD-ROMs in accordance with the provisions of 10 CFR 50.71(e).

- CNS Technical Requirements Manual Limiting Conditions for Operation
- Inservice Inspection Program for Cooper Nuclear Station
- Selected Controlled Station Drawings
- Plant Unique Analysis Report (no changes)

The CNS USAR has been reviewed for security-related information, as discussed in Regulatory Issue Summary 2015-17. As a result, Nebraska Public Power District is submitting both a non-public version (Enclosures 1, 2A & 2B) and a public version with security-related information removed (Enclosures 3, 4A & 4B).

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NRR

**Enclosures 1, 2A, and 2B contain Security-Related Information.
When separated from these enclosures, the remainder of this document is decontrolled.**

As specified by Nuclear Energy Institute (NEI) 98-03, Revision 1, "Guidelines for Updating Final Safety Analysis Reports," a summary listing of USAR deletions made during this reporting period is included as Attachment 2.

In accordance with NEI 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," a summary of commitment changes made during this reporting period is provided in Attachment 3.

Pursuant to the requirements of 10 CFR 50.4 and guidance for electronic submissions to the U.S. Nuclear Regulatory Commission (NRC), copies are being provided to the NRC Region IV Office and the NRC Resident Inspector for CNS.

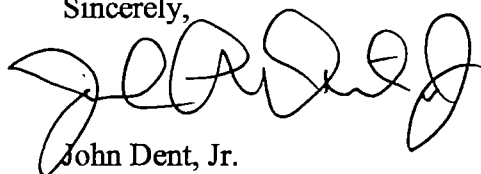
This letter contains no commitments.

If you have any questions regarding this submittal, please contact Linda Dewhirst, Regulatory Affairs and Compliance Manager, at (402) 825-5416.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 4/21/2021
Date

Sincerely,



John Dent, Jr.
Vice President - Nuclear and
Chief Nuclear Officer

/bk

Attachments: 1 - List of Document Components on CD-ROMs
2 - Summary of USAR Deletions
3 - Summary of Regulatory Commitment Changes

**Enclosures 1, 2A, and 2B contain Security-Related Information.
When separated from these enclosures, the remainder of this document is decontrolled.**

- Enclosures:
- 1 - USAR Revision XXX and Additional Documents Incorporated by Reference, Non-Public Version (on CD-ROM)
 - 2A - Station Drawings Incorporated in the USAR by Reference, Non-Public Version (on CD-ROM, 1 of 2)
 - 2B - Station Drawings Incorporated in the USAR by Reference, Non-Public Version (on CD-ROM, 2 of 2)
 - 3 - USAR Revision XXX and Additional Documents Incorporated by Reference, Public Version (on CD-ROM)
 - 4A - Station Drawings Incorporated in the USAR by Reference, Public Version (on CD-ROM, 1 of 2)
 - 4B - Station Drawings Incorporated in the USAR by Reference, Public Version (on CD-ROM, 2 of 2)

cc: Regional Administrator, w/ Attachments and Enclosures 1, 2A, 2B
USNRC - Region IV

Cooper Project Manager, w/ Attachments and Enclosures 1, 2A, 2B
USNRC - NRR Plant Licensing Branch IV

Senior Resident Inspector, w/ Attachments and Enclosures 1, 2A, 2B (2 copies)
USNRC - CNS

Institute of Nuclear Power Operations, w/ Attachments and Enclosures 3, 4A, 4B
Emergency Management

NPG Distribution, w/ Attachments and w/o Enclosures

CNS Records, w/ Attachments and Enclosures

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LIST OF DOCUMENT COMPONENTS ON CD-ROMS

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SUMMARY OF USAR DELETIONS

Section of Deletion	Description of Deletion	Basis for Deletion
VII-12.5.5 VII-12.6.5 VII-12.7.5	Deleted reference in each section to a built-in check source for the Elevated Release Point (ERP), Radwaste/Augmented Radwaste, and Turbine Building radiation monitoring systems.	This discussion is obsolete information that was not deleted at the time the station modification was implemented to disconnect or remove the built-in check sources for the ERP, Radwaste/Augmented Radwaste, and Turbine Building radiation monitoring systems.
X-9.3.2.1	Deleted specific spacing distance of "approximately 250 foot intervals," between fire hydrants.	Discussion of the spacing distance between fire hydrants is excess detail and was replaced with a description of "acceptable intervals." The current yard fire hydrant spacing was evaluated and determined functionally equivalent.
X-9.3.1	Deleted term "ionization."	The term ionization is excess detail and was deleted as other types of smoke detectors are used.

SUMMARY OF REGULATORY COMMITMENT CHANGES

The following regulatory commitment was revised by Nebraska Public Power District (NPPD) based upon evaluation performed in accordance with Nuclear Energy Institute 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes." This summary does not include any commitment changes for which separate U. S. Nuclear Regulatory Commission (NRC) notification was provided.

Source of Commitment: Letter from G.A. Trevors (NPPD) to NRC dated October 15, 1990, "Generic Letter 89-13 Recommended Inspection Program"

Change Description: In the subject response, NPPD stated that "The District will sample the Missouri River sediment once per year and analyze the samples for biological fouling organisms."

NPPD has withdrawn this commitment based on guidance in Recommended Program to Resolve Generic Issue 51 (Enclosure 1 of Generic Letter 89-13), paragraph D, which states in part "Water and substrate sampling is only necessary at freshwater plants that have not previously detected the presence of Asiatic clams in their source water bodies. If Asiatic clams are detected, utilities may discontinue this sampling activity if desired, and the chlorination (or equally effective) treatment program should be modified to be in agreement with paragraph B."

The first Asiatic clam was identified at Cooper Nuclear Station (CNS) during a 2004 inspection of a Turbine Equipment Cooling heat exchanger and the first zebra mussel was identified in 2016 in a Circulating Water bay. NPPD has implemented a chemical treatment program for the Service Water/Circulating Water systems at CNS to control zebra mussel and Asiatic clam populations. Chemical injections are controlled via maintenance plans and NPPD continues to perform routine sampling and analysis of the intake bays to monitor for biological fouling organisms.

Source of Commitment: Letter from R.L. Gardner (NPPD) to NRC dated August 6, 1993, "Licensee Event Report 93-029, Revision 0"

Change Description: In the subject correspondence, NPPD's corrective action reported in the Licensee Event Report (LER) was "Procedures related to ASME Class 1N system leakage testing will be revised to require better coordination of activities in the vicinity of the High Pressure-Scram switches and sensing lines which could result in an RPS actuation."

This commitment was revised to "Prevent unwanted RPV High Pressure scrams during the RPV Pressure test by defeating RPV High Pressure scram function during the ASME Class 1N System Leakage test."

The LER was required due to an event involving a spurious Reactor Protection System scram signal during replacement of an excess flow check valve during the 1N system leakage test. NPPD re-evaluated the evolution using recently acquired test equipment and further evaluated the Technical Specification Limiting Condition of Operation requirements for the Reactor Pressure Vessel (RPV) High Pressure Scram during the hydrostatic test. It was determined a better solution was to defeat the RPV High Pressure Scram function during the test. This change does not impact the ability to perform any required safety function and is an improvement to the overall risk associated with the hydrostatic test.