

From: Thomas Byrd
Sent: Wednesday, January 10, 2024 10:17 AM
To: Dewhirst, Linda R.
Cc: Unruh, Mark E.; Van Der Kamp, David W.
Subject: RE: Cooper - RAI - LAR DFO Tank Inspections (EPID L-2023-LLA-0126)
Attachments: RAI-10120-R1-FINAL DFO Tank Inspections LAR.pdf

On January 4, 2024, the U.S. Nuclear Regulatory Commission (NRC) Staff sent Nebraska Public Power District (the licensee) the draft Request for Additional Information (RAI) identified below. This RAI relates to the license amendment request dated September 26, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23249A134), seeking to add a note to technical specifications (TS) Section 3.8.3 in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.90. The proposed amendment would allow the use of temporary storage tanks utilized to supplement the required fuel oil storage tank inventory used by the emergency diesel generators. The proposed TS 3.8.3 change would only be applicable to the 2024 Refueling Outage 33 while in Modes 4 or 5 to allow cleaning, inspection, and repairs to the permanent diesel fuel oil storage tanks.

The licensee subsequently informed the NRC staff that further clarification was needed, the items were discussed January 9, 2024, and subsequently understood. A publicly available version of this final RAI (attached with "Draft" removed) will be placed in the NRC's ADAMS system. As agreed, please provide a response to this RAI within 30 days of this correspondence or by February 2, 2024.

Thomas Byrd
Project Manager - Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
Office: (301) 415-3719

From: Thomas Byrd
Sent: Thursday, January 4, 2024 8:41 AM
To: Dewhirst, Linda R. <lrdewhi@nppd.com>
Cc: Unruh, Mark E. <m1unruh@nppd.com>; Van Der Kamp, David W. <dwvande@nppd.com>
Subject: Cooper - RAI - LAR DFO Tank Inspections (EPID L-2023-LLA-0126)

By letter dated September 26, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23249A134), Nebraska Public Power District (NPPD, the licensee) submitted a license amendment request (LAR) for Cooper Nuclear Station (Cooper), seeking to add a note to technical specifications (TS) Section 3.8.3 in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.90. The proposed amendment would allow the use of temporary storage tanks utilized to supplement the required fuel oil storage tank inventory used by the emergency diesel generators. The proposed TS 3.8.3 change would only be applicable to the 2024 Refueling Outage 33 while in Modes 4 or 5 to allow cleaning, inspection, and repairs to the permanent diesel fuel oil storage tanks.

The Nuclear Regulatory Commission (NRC) staff reviewed the submittal and determined that additional information, as described in the attached request for additional information (RAI), is required for the staff to complete its review of the application. This RAI is identified as a draft at this time to confirm your understanding of the information that the NRC staff needs to complete the evaluation. Please let me know if you would like to have a call with the NRC staff to clarify this request. If the request for information is understood, please respond to this RAI within 30 days of the date of this request.

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Options

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Reply Requested: No
Sensitivity: Normal
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REQUEST FOR ADDITIONAL INFORMATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
COOPER - LAR TO PERFORM DFO TANK INSPECTIONS
NEBRASKA PUBLIC POWER DISTRICT
COOPER, UNIT 1
DOCKET NO. 05000298
ISSUE DATE: 01/04/2024

Background

By letter dated September 6, 2023, the Nebraska Public Power District (NPPD) submitted a license amendment request (LAR) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23249A134) to revise Technical Specifications (TS) 3.8.3, Diesel Fuel Oil (DFO), Lube Oil, and Starting Air, to allow for the use of temporary fuel oil storage tanks to supplement the required fuel oil storage inventory used by the emergency diesel generators during performance of required DFO tank inspections. This TS change would be applicable during the 2024 Refueling Outage 33 while in Modes 3 and 4 to allow cleaning, inspection, and any needed repairs, of the permanent DFO storage tanks.

Regulatory Basis

The regulation under 10 CFR 50.36(c)(2)(i) requires that technical specifications (TS) contain limiting conditions for operation (LCOs), which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TS until the condition can be met.

The regulation in 10 CFR 50.36(c)(3), "Surveillance requirements," states that "[s]urveillance requirements are requirements related to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

Question 1

In attachment 3 to the license amendment request (LAR) dated September 6, 2023 (ML23249A134), the licensee provided a markup of a proposed one-time change to Cooper TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to support a temporary configuration during diesel fuel oil storage tank maintenance activities. Proposed Note 2 to the TS 3.8.3 actions table would state:

A combination of fuel oil volumes in temporary storage tanks and permanent storage tanks may be utilized to support OPERABILITY of a DG [diesel generator] during tank cleaning and inspection maintenance activities. Equipment (temporary transfer pump, hoses, and appropriate fittings) capable of supplying fuel oil to the in-service permanent tank aligned to the operable DG must be available. The fuel oil in the temporary tanks, in conjunction with the fuel oil in the permanent tanks, must be within the limits of Condition A and Condition C. This temporary note is applicable only to the DG aligned to the in-service permanent tank. This temporary note is applicable only during Refuel Outage 33

while in MODES 4 or 5. This allowance is contingent upon meeting the compensatory measures contained in Attachment 2 of Nebraska Public Power District letter NLS2023029.

Provide a discussion of the following items regarding proposed Note 2:

a. The note begins: “A combination of fuel oil volumes in temporary storage tanks and permanent storage tanks may be utilized to support OPERABILITY of a DG...” This appears to describe an exception to the LCO and surveillance requirements related to diesel fuel oil acceptance criteria, not to the actions table. Discuss further the justification for the current location or consider whether the note should be relocated to other requirements (e.g., LCO or SR).

b. The third sentence states: “The fuel oil in the temporary tanks, in conjunction with the fuel oil in the permanent tanks, must be within the limits of Condition A and Condition C.” This sentence appears in conflict with item 9 of “Technical Specifications Compensatory Measures” found in attachment 2 to the LAR, which would require verification of at least a seven-day supply of fuel oil every 24 hours. Note 2 appears to require only a six- to seven-day supply (TS 3.8.3 condition A) and it also appears to prevent entry into conditions A and C (fuel oil particulates not within limit) during the fuel oil storage tank maintenance activity. Discuss the purpose of the third sentence in the note or provide a revision to the note or the LAR.

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/BC	NRR/DSS/STSB/BC
NAME	TByrd	JDixon-Herrity	ARussell
DATE	01/03/2024	12/20/2023	12/20/2023