



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 19, 1999

File Center  
57-298

Mr. J. H. Swailes  
Vice President of Nuclear Energy  
Nebraska Public Power District  
P. O. Box 98  
Brownville, NE 68321

SUBJECT: COOPER NUCLEAR STATION - COMPLETION OF LICENSING ACTION FOR  
GENERIC LETTER 98-04, "POTENTIAL FOR DEGRADATION OF THE  
EMERGENCY CORE COOLING SYSTEM AND THE CONTAINMENT SPRAY  
SYSTEM AFTER A LOSS-OF-COOLANT ACCIDENT BECAUSE OF  
CONSTRUCTION AND PROTECTIVE COATING DEFICIENCIES AND  
FOREIGN MATERIAL IN CONTAINMENT" (TAC NO. MA4036)

Dear Mr. Swailes:

On July 14, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-04 to all holders of operating licenses or construction permits. The NRC issued GL 98-04 to determine the status of containment coating programs.

In GL 98-04, the NRC staff specifically requested that the licensees provide information outlined below for each of their facilities.

- (1) A summary description of the plant-specific program or programs implemented to ensure that Service Level 1 protective coatings used inside the containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant-specific licensing basis for the facility. Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for (a) controlling the procurement of coatings and paints used at the facility; (b) the qualification testing of protective coatings; and (c) surface preparation, application, surveillance, and maintenance activities for protective coatings. Maintenance activities refer to rework of degraded coatings, removing degraded coatings to sound coatings, correctly preparing the surfaces, applying new coating, and verifying the quality of coatings.
- (2) Information demonstrating compliance with item (i) or item (ii).
  - (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related systems, structures, and components (SSCs) during a postulated design-basis loss-of-coolant accident (DBLOCA), the following information shall be provided to demonstrate compliance:
    - (a) The date and findings of the last assessment of coatings and the planned date of the next assessment of coatings.

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- (b) The limit for the amount of unqualified protective coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
  - (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies a coating for Service Level 1. Identify what standards or other guidance are currently being used to dedicate containment coatings at your facility.
- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10 CFR 50.46(b)(5), "Long-term cooling," and the functional capability of the safety-related containment spray system (CSS) as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:

If a commercial-grade dedication program is not being used at your facility for qualifying and dedicating commercial-grade coatings for Service Level 1 applications, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

In response to GL 98-04, you provided a letter dated November 4, 1998, for Cooper Nuclear Station. This submittal provided the information requested by GL 98-04. Clarification was provided during a telephone call that took place on July 27, 1999. The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 98-04 to be closed for your facility. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at 301-415-3053 or ljb@nrc.gov.

Sincerely,  
**ORIGINAL SIGNED BY**  
 Lawrence J. Burkhart, Project Manager, Section 1  
 Project Directorate IV & Decommissioning  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket No. 50-298

cc: See next page

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Cooper Nuclear Station

cc:

Mr. G. R. Horn  
Sr. Vice President of Energy Supply  
Nebraska Public Power District  
1414 15th Street  
Columbus, NE 68601

Mr. John R McPhail, General Counsel  
Nebraska Public Power District  
P. O. Box 499  
Columbus, NE 68602-0499

Mr. B. L. Houston, Nuclear Licensing  
and Safety Manager  
Nebraska Public Power District  
P. O. Box 98  
Brownville, NE 68321

Dr. William D. Leech  
Manager-Nuclear  
MidAmerican Energy  
907 Walnut Street  
P. O. Box 657  
Des Moines, IA 50303-0657

Mr. Ron Stoddard  
Lincoln Electric System  
1040 O Street  
P. O. Box 80869  
Lincoln, NE 68501-0869

Mr. Michael J. Linder, Director  
Nebraska Department of Environmental  
Quality  
P. O. Box 98922  
Lincoln, NE 68509-8922

Chairman  
Nemaha County Board of Commissioners  
Nemaha County Courthouse  
1824 N Street  
Auburn, NE 68305

Ms. Cheryl K. Rogers, Program Manager  
Nebraska Health & Human Services System  
Division of Public Health Assurance  
Consumer Services Section  
301 Centennial Mall, South  
P. O. Box 95007  
Lincoln, NE 68509-5007

Mr. Ronald A. Kucera, Director  
of Intergovernmental Cooperation  
Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 218  
Brownville, NE 68321

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

Jerry Uhlmann, Director  
State Emergency Management Agency  
P. O. Box 116  
Jefferson City, MO 65101

Chief, Radiation Control Program, RCP  
Kansas Department of Health  
and Environment  
Bureau of Air and Radiation  
Forbes Field Building 283  
Topeka, KS 66620

September 28, 1999