



**Nebraska Public Power District**  
*Nebraska's Energy Leader*

NLS990096  
December 9, 1999

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

Gentlemen:

Subject: Extension of Commitment Date  
Cooper Nuclear Station, NRC Docket No. 50-298, DPR-46

- Reference:
1. Letter NLS980206 to Document Control Desk (USNRC) from John H. Swailes (NPPD), dated January 27, 1999, "Reply to Notice of Violation, NRC Inspection Report No. 50-298/98-15"
  2. Letter to G. R. Horn (NPPD) from Arthur T. Howell III (USNRC), dated December 17, 1998, "NRC Inspection Report 50-298/98-15, Notice of Violation and Exercise of Enforcement Discretion"

By letter dated January 27, 1999 (Reference 1) the Nebraska Public Power District (District) committed to conduct a review of the Daily Surveillance Logs (Procedures 6.LOG.601 and 6.LOG.602), and revise the procedures as necessary by September 15, 1999, to ensure acceptance criteria where operator action is required appropriately takes into account instrument uncertainties. The District is extending completion of this commitment to October 13, 2000. This commitment was made as a corrective action to prevent the recurrence of a violation of 10 CFR Part 50 Appendix B, Criterion V. The violation was a result of a failure to include the instrument uncertainties of the temperature indicator MI-TR-3020 (Reference 2) in the surveillance procedures' acceptance criteria for a maximum service water temperature of 90 degrees F.

The District has completed specific actions to address the violation. The District has implemented a Temporary Configuration Change to provide a highly accurate local indication to monitor river water temperature concurrently with the existing Control Room indication, and has revised the applicable Operations procedures (6.LOG.601 and 6.LOG.602) to address required actions on this local indicator should specified temperatures be exceeded. The District has trended the differences between the local and Control Room indications. This information has demonstrated that the Control Room indicator has consistently provided conservative indication

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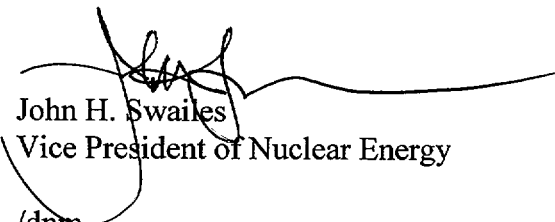
NLS990096  
December 9, 1999  
Page 2 of 2

of river water temperature such that the nominal Technical Specification (TS) value of 90 degrees F would not have been exceeded.

However, the District is extending the commitment completion date in order to address this topic from a broader perspective. The District is currently engaging in industry discussions to assure proper scope and efficient use of resources, to learn from industry insights regarding methods and safety assessment, and to provide consistency in approach. The District's primary action in this area is active participation in a Boiling Water Reactor Owners Group (BWROG) committee evaluating instrument uncertainty. This approach offers appropriate and prudent measures to ensure the adequacy of the applicable surveillance procedures and to determine if improvements are warranted.

Should you have any questions concerning this matter, please contact me.

Sincerely,



John H. Swailes  
Vice President of Nuclear Energy

/dnm

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

NPG Distribution

ATTACHMENT 3 LIST OF NRC COMMITMENTS

Correspondence No: NLS990096

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
The District will conduct a review of the Daily Surveillance Logs (6.LOG.601 and 6.LOG.602), and revise the procedures as necessary, to ensure acceptance criteria where operator action is required appropriately takes into account instrument uncertainties.	October 13, 2000