



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

NLS990118  
December 15, 1999

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

**Subject:** Changes to CNS USAR Rebaselining Project Completion Strategy  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

- Reference:**
1. Letter (No. NLS970053) to USNRC Document Control Desk from Mr. P. D. Graham (NPPD), dated March 31, 1997, "USAR Rebaselining Project Description"
  2. Letter (No. NLS980044) to USNRC Document Control Desk from Mr. M. F. Peckham for Mr. J. H. Swailes (NPPD), dated June 24, 1998, "Revision of Commitments Made in the Performance of the CNS USAR Rebaseline Project"
  3. NRC Enforcement Guidance Memorandum No. EGM 98-007, dated September 15, 1998, "Extension of Exercise of Discretion for FSAR Discrepancies Identified while the Licensee has a Defined Program for Identifying such Discrepancies"

As described in References 1 and 2, the Nebraska Public Power District (District) provided details to the NRC on our commitment to rebaseline the Cooper Nuclear Station (CNS) Updated Safety Analysis Report (USAR). Since that time, the District has reconsidered the strategy for completing the USAR Rebaseline Project (Project). Fundamentally, the scope and breadth of the USAR rebaseline effort remain as previously described with the principal objective being to assure full compliance with 10CFR50.71(e) through focusing on USAR accuracy, completeness, and consistency/clarity issues. The purpose of this letter is to notify the NRC of the District's intent to revise the formal commitment previously made, and to provide additional information that is influencing the Project completion strategy.

In Reference 2, the District committed to Project completion by December 31, 1999. Due to certain contractual and scheduling difficulties, Project completion has been delayed. The rebaseline of "risk significant Structures, Systems, and Components (SCCs)" will now be completed by March 30, 2000. This date was deemed by the NRC to be acceptable in EGM 98-007 (Reference 3). Based on the types of USAR-related discrepancies found to date for the risk significant SCCs, this deferral will not be detrimental to plant safety. In addition, the balance of the USAR issues will be addressed by March 30, 2001, which is also deemed acceptable by the NRC in EGM 98-007 (Reference 3).

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In Reference 1, the District's general Project approach was described. Since that time, the District has provided integral support to the Nuclear Energy Institute (NEI) in developing NEI 98-03, Revision 1, "Guidelines for Updating Final Safety Analysis Reports" (which was endorsed by the NRC in Regulatory Guide 1.181). As a result of this interaction, the District has gained additional insight on what constitutes 10CFR50.71(e) compliance. Accordingly, the Project is using the guidance of NEI 98-03, Revision 1 and the NEI "Questions and Answers on FSAR Updates and NEI 98-03 - June 1999" as additional inputs into the conduct of the Project. Therefore, there may be some deviation from the general Project approach described in Reference 1.

Should you have any questions or desire additional information, please contact my office.

Sincerely,



John H. Swailes  
Vice President of Nuclear Energy

/wrv/dnm  
Attachment

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

NPG Distribution

