



Nebraska Public Power District

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NLS2012109
October 29, 2012

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

Subject: Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Nuclear Regulatory Commission Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
 2. Nuclear Regulatory Commission Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012
 3. Nuclear Energy Institute Letter to Nuclear Regulatory Commission "Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)," dated February 24, 2012
 4. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Nebraska Public Power District (NPPD). Reference 1 was immediately effective and directs NPPD to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance (ISG). The final ISG (Reference 2) was issued August 29, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms NPPD has received Reference 2 and is in the process of evaluating the guidance for the purpose of

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establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered, as described in a Nuclear Energy Institute (NEI) letter to the NRC (Reference 3). Recent re-evaluation of Reference 3 determined that more portable equipment would need to be ordered to fully comply with the request. This additional portable equipment has been ordered.
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

Project milestones schedule through completion of installation and testing:

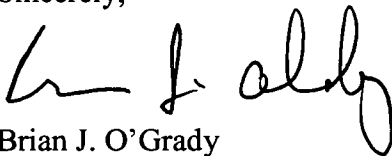
- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Cooper Nuclear Station prior to startup from Refueling Outage 29 (Fall 2016).

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David Van Der Kamp, Licensing Manager, at (402) 825-2904.

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

Executed On 10/29/12
(Date)

Sincerely,



Brian J. O'Grady
Vice President - Nuclear and
Chief Nuclear Officer

/bk

cc: Regional Administrator
USNRC - Region IV

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