



Nebraska Public Power District

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NLS2013079
August 27, 2013

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

Subject: Cooper Nuclear Station's First Six-Month 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. NRC 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. NRC 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. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012
 4. Nebraska Public Power District's 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), dated October 29, 2012
 5. Cooper Nuclear Station's Overall Integrated Plan 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), dated February 28, 2013
 6. NRC Order Number EA-12-050, "Order to Modify Licenses with Regard to Reliable Hardened Containment Vents," dated March 12, 2012
 7. NRC Order Number EA-13-109, "Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013

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MLR

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 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided NPPD's initial status report for Cooper Nuclear Station (CNS) regarding mitigation strategies. Reference 5 provided CNS' overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

The strategies in the overall integrated plan currently rely on the conceptual design of the reliable hardened vent system that was developed in response to NRC Order EA-12-050 (Reference 6). NRC Order EA-13-109 (Reference 7) issued June 6, 2013, rescinds the requirements of NRC Order EA-12-050. Compliance with the requirements of NRC Order EA-12-050, including applicable schedule deadlines for submittals or implementation, is no longer required. The industry, through the Nuclear Energy Institute and the owners' group, is addressing the new requirements on the schedule outlined in NRC Order EA-13-109. Because of the new Order, the design of the hardened containment vent is being reevaluated. Any design changes resulting from the revised hardened vent order will be reflected in a future six-month update.

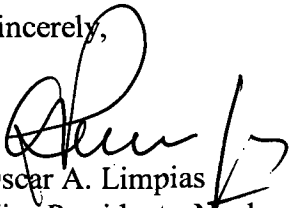
This letter contains no new regulatory commitments.

Should 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: 8/27/13

Sincerely,



Oscar A. Limpas
Vice President - Nuclear and
Chief Nuclear Officer

/bk

Attachment: Cooper Nuclear Station's First Six-Month Status Report for the
Implementation of Order EA-12-049, Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: Regional Administrator, w/attachment
USNRC - Region IV

Director, w/attachment
USNRC - Office of Nuclear Reactor Regulation

Cooper Project Manager, w/attachment
USNRC - NRR Project Directorate IV-1

Ms. Jessica A. Kratchman, w/attachment
USNRC - NRR

Senior Resident Inspector, w/attachment
USNRC - CNS

NPG Distribution, w/attachment

CNS Records, w/attachment

Attachment

Cooper Nuclear Station's First Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

Introduction

Nebraska Public Power District (NPPD) developed an overall integrated plan for Cooper Nuclear Station (Reference 1), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the overall integrated plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

Milestone Accomplishments

The following milestone(s) have been completed since the development of the overall integrated plan (Reference 1), and are current as of July 30, 2013:

None; no milestones were scheduled to be completed, with the exception of this first six-month update.

Milestone Schedule Status

The following table provides an update to Attachment 2 of the overall integrated plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

A new milestone has been added for walk-throughs or demonstrations with a target completion date of April 2015. This new milestone and initial target date do not impact the Order implementation date.

Milestone	Target Completion Date	Status	Revised Target Completion Date
60-day Status Update	October 2012	Complete	
Submit Overall Integrated Plan	February 2013	Complete	
6-month Status Update	August 2013	Complete	
Refine Strategies (post-NRC review)	September 2013	Not Started	
Develop Strategies / Contract with Regional Response Center	January 2014	Not Started	
6-month Status Update	February 2014	Not Started	

Regional Response Center Operations	TBD	Not Started	
Develop Storage Plan	May 2014	Not Started	
Purchase FLEX Equipment	June 2014	Not Started	
Issue Maintenance Procedures (for FLEX equipment)	August 2014	Not Started	
6-month Status Update	August 2014	Not Started	
Develop Training Plan	October 2014	Not Started	
Implementation Outage 1	Fall 2014	Not Started	
Develop Online Mods and Implementing Procedures	December 2014	Not Started	
6-month Status Update	February 2015	Not Started	
Walk-throughs or Demonstrations	--	Not Started	April 2015
Implement Training	May 2015	Not Started	
6-month Status Update	August 2015	Not Started	
Develop Outage Mods and Implementing Procedures	October 2015	Not Started	
Implement Online Mods and Procedures	December 2015	Not Started	
6-month Status Update	February 2016	Not Started	
Perform Staffing Assessment	May 2016	Not Started	
6-month Status Update	August 2016	Not Started	
Implementation Outage 2	Fall 2016	Not Started	
Implement Outage Mods and Procedures	Fall 2016	Not Started	
Implement Training Updates	Fall 2016	Not Started	
Submit Completion Report	Fall 2016	Not Started	

Changes to Compliance Method

There are no changes to the compliance method as documented in the overall integrated plan at this time.

The FLEX strategies in the overall integrated plan (Reference 1) currently rely on the conceptual design of the reliable hardened vent system that was developed in response to NRC Order EA-12-050 (Reference 3). NRC Order EA-13-109 (Reference 4) issued June 6, 2013, rescinds the requirements of NRC Order EA-12-050. Compliance with the requirements of NRC Order EA-12-050, including applicable schedule deadlines for submittals or implementation, is no longer required. The industry, through the Nuclear Energy Institute and the owners' group, is addressing the new requirements on the schedule outlined in NRC Order EA-13-109. Because of the new Order, the design of the hardened containment vent is being reevaluated. Any design changes resulting from the revised hardened vent order will be reflected in a future six-month update.

Need for Relief/Relaxation and Basis for the Relief/Relaxation

NPPD expects to comply with the Order implementation date and no relief/relaxation is required at this time.

Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following table provides a summary of the open items documented in the overall integrated plan or the Draft Safety Evaluation (SE) and the status of each item.

Overall Integrated Plan Open Item	Status
Primary and secondary storage locations have not been selected yet. Once locations are finalized implementation routes will be defined.	Started
The location and sizing of the new raw water well has not been determined.	Not Started
The method of transferring water from the hotwell to the ECSTs has not been determined.	Not Started
The staging area for the Regional Response Center (RRC) equipment has not been determined.	Not Started
Exceptions for the site security plan or other (license/site specific) requirements of 10 CFR may be required. Coordination of site FLEX integrated Plan with security personnel is required.	Not Started

Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft SE identified at this time.

References

The following references support the updates to the overall integrated plan described in this attachment:

1. Cooper Nuclear Station's Overall Integrated Plan 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), dated February 28, 2013
2. NRC 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
3. NRC Order Number EA-12-050, "Order to Modify Licenses with Regard to Reliable Hardened Containment Vents," dated March 12, 2012
4. NRC Order Number EA-13-109, "Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013