



**Nebraska Public Power District**

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NLS2011111  
December 28, 2011

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

**Subject:** Completion of License Renewal Commitments NLS2009100-2, NLS2009100-3,  
and NLS2008071-26  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

**Reference:**

1. Letter from Brian J. O'Grady (Nebraska Public Power District) to U.S. Nuclear Regulatory Commission, dated December 21, 2009, "Response to Request for Additional Information for the Review of Cooper Nuclear Station License Renewal Application" (NLS2009100).
2. NUREG-1944, "Safety Evaluation Report Related to the License Renewal of Cooper Nuclear Station," dated September 2010.
3. Letter from Stewart B. Minahan (Nebraska Public Power District) to U.S. Nuclear Regulatory Commission, dated September 24, 2008, "License Renewal Application" (NLS2008071).

Dear Sir or Madam:

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) that License Renewal Commitments NLS2009100-2, NLS2009100-3, and NLS2008071-26 have been completed. This submittal is made pursuant to License Condition F of the Cooper Nuclear Station (CNS) renewed Operating License, which requires written NRC notification of the completion of License Renewal commitments.

In Reference 1, the Nebraska Public Power District (NPPD) made the following commitments:

NPPD will confirm that there are no niobium-bearing CASS materials used for vessel internal components, or provide a flaw evaluation methodology for niobium-bearing CASS internal components for staff review and approval. This will be provided at least two years prior to the period of extended operation. NPPD expects to implement this commitment by a generic analysis sponsored by the BWRVIP in collaboration with EPRI. [Commitment Number NLS2009100-2]

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NPPD will confirm there are no CASS materials with greater than 25% ferrite or provide a flaw evaluation methodology for CASS internal components with greater than 25% ferrite for staff review and approval. This will be provided at least two years prior to the period of extended operation. NPPD expects to implement this commitment by a generic analysis sponsored by the BWRVIP in collaboration with EPRI. [Commitment Number NLS2009100-3]

These commitments were acknowledged in Appendix A of Reference 2. Regarding NLS2009100-2, NPPD has consulted with General Electric Hitachi, and confirms that there are no niobium-bearing cast austenitic stainless steel (CASS) materials used for vessel internal components. Regarding NLS2009100-3, NPPD cites the issuance of BWRVIP-234, "Thermal Aging and Neutron Embrittlement Evaluation of Cast Austenitic Stainless Steel For BWR Internals." This report provides a review of boiling water reactor CASS materials applicable to CNS in regards to ferrite and molybdenum contents, and demonstrates that CNS does not have CASS components that are composed of sufficient levels of ferrite and molybdenum to be susceptible to the aging effects managed by the Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel Program. NPPD understands that this report is still under review by the NRC, and will monitor it's acceptability within the CNS Boiling Water Reactor Vessel Internals Project (BWRVIP) Program.

In Reference 3, NPPD made the following commitment:

Implement the Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Program. [LRA Section B.1.37] [Commitment Number NLS2008071-26]

This commitment was also acknowledged in Appendix A of Reference 2. With the completion of Commitments NLS2009100-2 and 3 above, NPPD has concluded that CNS has no susceptible reactor vessel internals that require further aging management under the License Renewal Application (LRA) B.1.37 program. Accordingly, this commitment has been implemented.

Should you have any questions regarding this submittal, please contact David Bremer, License Renewal Implementation Project Manager, at (402) 825-5673.

Sincerely,



David W. Van Der Kamp  
Licensing Manager

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cc: Regional Administrator  
USNRC - Region IV

Cooper Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC - CNS

NPG Distribution

CNS Records

Correspondence Number: NLS2011111

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
None		