



Nebraska Public Power District

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NSD930978

August 23, 1993

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: Proposed Change No. 121 to Technical Specifications
Administrative Controls "Organization" Vice President - Nuclear
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

Gentlemen:

In accordance with the applicable revisions specified in 10 CFR 50, the Nebraska Public Power District (District) requests that the Cooper Nuclear Station (CNS) Technical Specifications be revised as specified in the attachment. This proposed change modifies the organizational structure by creating the management position of "Vice President - Nuclear". This change is being made to ensure that the CNS Technical Specifications are consistent with the organizational structure of the District. The titled position Vice President - Nuclear will assume all the functions and responsibilities of the previous titled position of Nuclear Power Group Manager.

The attachment contains a description of the proposed changes, the attendant 10CFR50.92 evaluation, and the applicable revised Technical Specifications pages in both final and marked up forms for your convenience. This proposed change has been reviewed by the necessary Safety Review Committees and incorporates all amendments to the CNS Facility Operating License through Amendment 165 issued July 16, 1993.

By copy of this letter and attachment the appropriate State of Nebraska official is being notified in accordance with 10CFR50.91(b)(1). Copies to the NRC Region IV Office and CNS NRC Resident Inspector are also being sent in accordance with 10CFR50.4(b)(2).

Should you have any questions or require additional information, please contact me.

Sincerely,

G. R. Horn
Vice President - Nuclear

GRH/tja:pc-121
Attachment

cc: H. R. Borchert
Department of Health
State of Nebraska

NRC Regional Office
Region IV
Arlington, TX

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NRC Resident Inspector
Cooper Nuclear Station

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Page 2

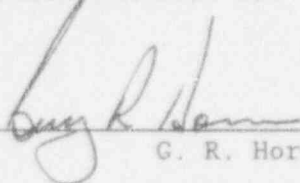
August 23, 1993

STATE OF NEBRASKA)

) ss

PLATTE COUNTY)

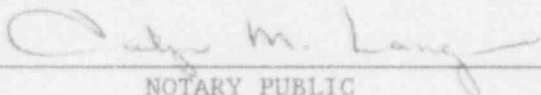
G. R. Horn, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this request on behalf of Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.



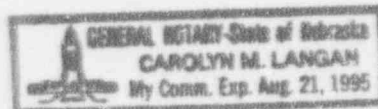
G. R. Horn

Subscribed in my presence and sworn to before me this

23rd day of August, 1993.



NOTARY PUBLIC



REVISED TECHNICAL SPECIFICATIONS
ADMINISTRATIVE CONTROLS - ORGANIZATION CHANGE
VICE PRESIDENT - NUCLEAR

Revised Pages: 219, 221, 223, and 234

DISCUSSION

This request proposes to revise the Cooper Nuclear Station (CNS) Technical Specifications Section 6.0, "Administrative Controls." In particular, this proposal involves a change to the position title Nuclear Power Group Manager throughout Section 6. Recently, the Nebraska Public Power District (DISTRICT) has created the position of Vice President - Nuclear, this position will assume all the functions and responsibilities of the previous position of Nuclear Power Group Manager. The District requests to revise the CNS Technical Specifications to reflect this change in the organization.

The change in creating the position of Vice President - Nuclear does not affect the nuclear management reporting relationships that are currently in place at Nebraska Public Power District. This change will continue to provide for senior management attention to each of the functional areas in the District's onsite and offsite nuclear organization. The Vice President - Nuclear is responsible for all the activities of the Nuclear Power Group.

DESCRIPTION OF CHANGES

The District requests that the CNS Technical Specifications Section 6.0, "Administrative Controls" be revised to reflect the change in the management position title of Nuclear Power Group Manager to Vice President - Nuclear, as described below. A mark-up of the affected CNS Technical Specification pages are provided in Appendix A, and the new affected CNS Technical Specification pages are provided in Appendix B. The specific changes proposed to the CNS Technical Specifications are detailed below:

Page 219 - Revise Specification 6.1.2.C, to read "Vice President - Nuclear"

Page 221 - Revise Specification 6.2.1.A.4.f, to read "Vice President - Nuclear"

Revise Specification 6.2.1.A.5.b, to read "Vice President - Nuclear"

Revise Specification 6.2.1.A.6, to read "Vice President - Nuclear"

Page 223 - Revise Specification 6.2.B.5, to read "Vice President - Nuclear"

Revise Specification 6.2.B.6, to read "Vice President - Nuclear"

Page 234 - Revise Specification 6.5.2, to read "Vice President - Nuclear"

The proposed revision to the CNS Technical Specifications in the "Administrative Controls Section" for the titled position Vice President - Nuclear will continue to provide for qualified and responsible individuals for those senior management activities involving operations, maintenance, engineering, radiological controls, station security, training, administrative support etc... The executive position that has corporate responsibility for overall nuclear plant safety will be the Vice President - Nuclear. This individual shall continue to take any measures that may be necessary to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. This proposed revision deals with only the position title change in the organizational structure.

SIGNIFICANT HAZARDS DETERMINATION

10CFR50.91(a)(1), requires that licensee requests for operating license amendments be accompanied by an evaluation of significant hazards posed by the issuance of the amendment. This evaluation is to be performed with respect to the criteria given in 10CFR50.92(c). The following analysis meets these requirements.

Evaluation of this Amendment with Respect to 10 CFR 50.92

The enclosed Technical Specification change is judged to involve no significant hazards based on the following:

1. Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Evaluation

The proposed change in the titled position of the Vice President - Nuclear is administrative in nature. The functions and responsibilities of previous position of Nuclear Power Group Manager will be performed by the new position of Vice President - Nuclear. This is solely a title change to the position identified in the Technical Specifications. The description, job function, and responsibilities of the position remain the same. This position title change in the organization does not affect plant design or operation, nor does it affect the way any systems, structures, or components are operated or maintained. The individual filling this position is qualified to perform the assigned tasks and responsibilities. Also, this proposed change does not alter the conditions or assumptions in any of the Updated Safety Analysis Report (USAR) accident analyses. Since the USAR accident analyses remain

bounding, the consequences previously evaluated are not adversely affected by the proposed change. Therefore, it can be concluded that the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed License Amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Evaluation

The proposed Technical Specification revision changes the position title of the Nuclear Power Group Manager to the Vice President - Nuclear. This titled position change only affects a title in the organizational structure for the District. All responsibilities for this position remain as described in the Technical Specifications for management activities and they will continue to be performed by a qualified individual. This change does not affect the design or operation of any system, structure, or component in the plant, and is considered to be administrative change. Accordingly, no new failure modes have been defined for any plant system or component important to safety, nor has any new limiting failure been identified as a result of the proposed change. Therefore, this proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in the margin of safety?

Evaluation

This proposed change to the Technical Specifications is in the Administrative Controls Section, specifically a title change in the organizational structure. The Nuclear Power Group Manager position is being changed to Vice President - Nuclear. All responsibilities for this position remain as described in the Technical Specifications for management activities and they will continue to be performed by a qualified individual. The proposed change does not adversely impact the plant's ability to meet applicable regulatory requirements. The proposed change does not alter any administrative controls, nor does the proposed change involve any physical alterations to the plant, and does not affect any plant safety parameters or setpoints. Therefore, this proposed change does not involve a significant reduction in the margin of safety.

ADDITIONAL BASIS FOR NO SIGNIFICANT HAZARDS DETERMINATION

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (51FR7744). The examples include: (i) A purely administrative change to Technical Specifications: for example, a change in nomenclature. The proposed change to the CNS T/S regarding the change in the titled position of "Vice President - Nuclear", are within the scope of this example.

CONCLUSION

The District has evaluated the proposed changes described above against the criteria of 10CFR50.92(c) in accordance with the requirements of 10CFR50.91(a)(1). This evaluation has determined that Proposed Change No. 121 to the CNS Technical Specifications will not; 1) involve a significant increase in the probability or consequences of an accident previously evaluated; 2) create the possibility for a new or different kind of accident from any accident previously evaluated; or 3) create a significant reduction in the margin of safety. Therefore, the District requests NRC approval of proposed change No. 121 to the CNS Technical Specifications.