



## Nebraska Public Power District

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NSD931096  
September 28, 1993

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

Subject: Proposed Change No. 123 to Technical Specifications  
Administrative Controls "Organization"  
Cooper Nuclear Station  
NRC Docket No. 50-298, DPR-46

Reference: Letter G. R. Horn (NPPD) to USNRC dated August 23,  
1993, "Proposed Technical Specifications Change No. 121  
Vice President - Nuclear"

Gentlemen:

In accordance with the applicable provisions 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 removing the management positions of "Site Manager" and "Senior Manager of Operations". This change is being made to ensure that the CNS Technical Specifications are consistent with the organizational structure of the District. The functions presently given in Technical Specifications for the Site Manager position will be assumed by the Vice President - Nuclear. Additionally, throughout the attached CNS Technical Specification pages, the term "Nuclear Power Group Manager" will be replaced with the term "Vice President - Nuclear", as discussed in the Reference.

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).

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Powerful Pride in Nebraska

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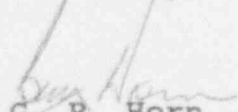
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Should you have any questions or require additional information, please contact me.

Sincerely,



G. R. Horn

Vice President - Nuclear

GRH/tja:pc-123

Attachment

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

NRC Regional Office  
Region IV  
Arlington, TX

NRC Resident Inspector  
Cooper Nuclear Station

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STATE OF NEBRASKA )  
 ) ss  
PLATTE COUNTY )

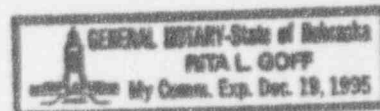
G. R. Horn, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this request on behalf of Nebraska Public Power District; and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

  
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G. R. Horn

Subscribed in my presence and sworn to before me this

28<sup>th</sup> day of September, 1993.

  
\_\_\_\_\_  
NOTARY PUBLIC



REVISED TECHNICAL SPECIFICATIONS  
ADMINISTRATIVE CONTROLS - ORGANIZATION CHANGE

Revised Pages: 219, 221, and 223

Reference: Letter G. R. Horn (NPPD) to USNRC dated August 23, 1993, "Proposed Technical Specifications Change No. 121, Vice President - Nuclear"

DISCUSSION

This request proposes to revise the Cooper Nuclear Station (CNS) Technical Specifications Section 6.0, "Administrative Controls." In particular, this proposal involves removal of the position titles "Site Manager" and "Senior Manager of Operations" throughout Section 6.0. Recently, the Nebraska Public Power District (DISTRICT) created the position of Vice President - Nuclear. This position assumed all the functions and responsibilities of the previous position of Nuclear Power Group Manager.<sup>1</sup> The responsibilities of the Site Manager position presently given in the Technical Specifications will now be performed by the Vice President - Nuclear. Therefore, the position "Site Manager" and all references to it are being removed from the CNS Technical Specifications. Additionally, with the reorganization the need for the Senior Manager of Operations is no longer required, and therefore, this titled position is also being removed. The provision in the Technical Specifications for automatic shifting of Plant Manager responsibilities to the Senior Manager of Operations has also been removed. The shifting of the Plant Manager responsibilities (in writing) to one of the Managers at CNS who are qualified for this position remains in the Technical Specifications. The District requests to revise the CNS Technical Specifications to reflect these changes in the organization.

The change in removing the positions of "Site Manager" and "Senior Manager of Operations" from the Technical Specifications 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 Nuclear Power Group activities, both onsite and offsite.

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<sup>1</sup> Throughout the attached CNS Technical Specification pages the term "Nuclear Power Group Manager" will be replaced with the term "Vice President - Nuclear", as discussed in the Reference.

#### DESCRIPTION OF CHANGES

The District requests that the CNS Technical Specifications Section 6.0, "Administrative Controls" be revised to reflect the change in removal of the management position titles "Site Manager" and "Senior Manager of Operations". The responsibilities of the Site Manager as presently given in the Technical Specifications will be incorporated into the duties of the Vice President - Nuclear, as described below. Additionally, the title and responsibilities for the Senior Manager of Operations are also being removed. 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 6.1.1, to remove the reference to "Site Manager" and replace it with "Vice President - Nuclear. Delete all references to the Senior Manager of Operations and his responsibilities. Finally, revise the sentence indicating that the Vice President - Nuclear has corporate responsibility.

Remove Specification 6.1.2.B, renumber Specification 6.1.2.C to read "6.1.2.B", and renumber Specification 6.1.2.D to read "6.1.2.C".

Page 221 - Revise Specification 6.2.1.A.5.b, by removing reference to Site Manager.

Page 223 - Revise Specification 6.2.B.6, by removing reference to Site Manager, and restructuring the last sentence in the Specification.

The proposed revision to the CNS Technical Specifications in the "Administrative Controls Section" will continue to provide for qualified and responsible individuals for those senior management activities involving operations, maintenance, engineering, radiological controls, station security, training, and administrative support. 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 only with the removal of positions as referenced in the Technical Specifications so that the CNS Technical Specifications accurately reflect the current NPPD 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 removing the positions of Site Manager and Senior Manager of Operations from the Technical Specifications is administrative in nature. The functions and responsibilities of the previous position of Site Manager presently given in the plant Technical Specifications will be performed by the Vice President - Nuclear. Additionally, with the reorganization, the Senior Manager of Operations position is eliminated and therefore, this position is also being removed. The provision in the Technical Specifications for automatic shifting of Plant Manager responsibilities to the Senior Manager of Operations has also been removed. The shifting of Plant Manager responsibilities (in writing) to one of the Managers at CNS who is qualified for this position remains in the Technical Specifications. The position removals and responsibility transfers in the organization do not affect plant design or operation, nor do they affect the way any systems, structures, or components are operated or maintained. The individual filling the position "Vice President - Nuclear" is qualified to perform the assigned tasks and responsibilities. Restructuring of the sentence in specification 6.2.B.6, is purely an administrative change. 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 removes all references to the position title of the Site Manager. The responsibilities of this position presently given in the Technical Specifications are being incorporated and performed by the position "Vice President - Nuclear". Additionally, with the reorganization, the Senior Manager of Operations position is eliminated and therefore, this position is also being removed. The shifting of Plant Manager responsibilities (in writing) to one of the Managers at CNS who is qualified for this position remains in the Technical Specifications. All given management activities will continue to be performed by qualified individuals. Restructuring of the sentence in specification 6.2.B.6, is purely an administrative change. This change does not affect the design or operation of any system, structure, or component in the plant, and is considered to be an 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 amendment involves a change to the Administrative Controls Section of the CNS Technical Specifications, specifically removal of two positions referenced in the organizational structure. The Site Manager position is being deleted and the responsibilities of this position listed in the Technical Specifications are being performed by the Vice President - Nuclear. Additionally, with the reorganization, the Senior Manager of Operations position is eliminated and therefore, this position and responsibilities are also being removed. The shifting of Plant Manager responsibilities (in writing) to one of the Managers at CNS who is qualified for this position remains in the Technical Specifications. All given management activities as described in the Technical Specifications will continue to be performed by qualified individuals. Restructuring of the sentence in specification 6.2.B.6, is purely an administrative change. The proposed change does not adversely impact the plant's ability to meet applicable regulatory requirements. The proposed change does not alter any means of plant operation, 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 Technical Specifications regarding the removal of the position "Site Manager", and all references to it, is 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. 123 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. 123 to the CNS Technical Specifications.