



Nebraska Public Power District

GENERAL OFFICE
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NLS9100117
March 11, 1991

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

Gentlemen:

Subject: Proposed Change No. 94 to Technical Specifications
RHR Logic System Functional Tests
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

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. The District has determined that the surveillance testing of the Residual Heat Removal (RHR) System initiation and pump and valve control is undesirable during power operation. Accordingly, this proposed change requests that the NRC approve changing the surveillance frequency from once/6 months to once/18 months to remove the requirement to perform this surveillance testing during power operation.

The District identified this concern during a recent review of CNS surveillance procedures. This review identified that during logic system functional testing of RHR initiation and pump and valve control, the system is placed in a configuration which precludes rapid restoration of the design function. The District has further determined that no feasible changes to the applicable surveillance procedures exist which would eliminate these undesirable conditions. Therefore, the District requests the NRC approve changing this surveillance frequency to once/18 months which is consistent with the current BWR-4 Standard Technical Specifications (NUREG-1202).

The next scheduled RHR logic system functional test becomes due on April 15, 1991, and with the 25% margin, becomes overdue on May 27, 1991. Therefore, to avoid performing this surveillance testing during reactor power operations, the District requests NRC approval of this proposed change by May 27, 1991.

The attached contains a description of the proposed change, the attendant 10 CFR 50.92 evaluation, and the CNS Technical Specification page revised by the institution of this change. This proposed change has been reviewed by the

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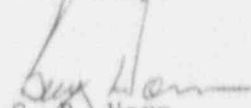
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necessary Safety Review Committees and incorporates all amendments to the CNS Facility Operating License through Amendment 136 issued February 25, 1991.

In addition to the signed original, 37 copies are also submitted for your use. By copy of this letter and attachment the appropriate State of Nebraska official is being notified in accordance with 10 CFR 50.91(b)(1). Copies to the NRC Region IV Office and the CNS Resident Inspector are also being sent in accordance with 10 CFR 50.4(b)(2).

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

Sincerely,



G. R. Horn
Nuclear Power Group Manager

GRH/mjb
Attachment

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

NRC Regional Office
Region IV
Arlington, TX

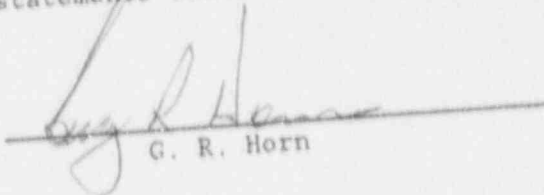
NRC Resident Inspector
Cooper Nuclear Station

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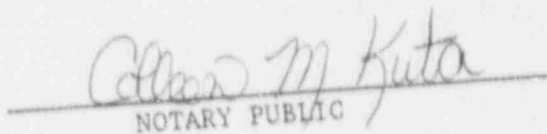
STATE OF NEBRASKA)

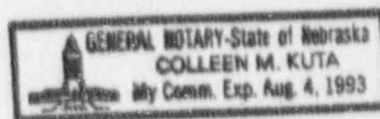
PLATTE COUNTY)

G. P. 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 11th day of March, 1991.

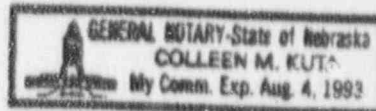

NOTARY PUBLIC



STATE OF NEBRASKA)
PLATTE COUNTY)

G. R. Horn
G. R. Horn

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REVISED TECHNICAL SPECIFICATIONS
RHR LOGIC SYSTEM FUNCTIONAL TESTS

Revised Page

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I. INTRODUCTION

The Nebraska Public Power District (District) requests that the NRC approve the proposed changes to the CNS Technical Specifications described below. This proposed change was identified as a result of a District review of the Cooper Nuclear Station (CNS) surveillance procedures to identify potential concerns regarding the capability of systems to respond to design basis events while in a required surveillance test configuration. This review determined that during surveillance testing of the Residual Heat Removal System (RHR) initiation and pump and valve control logic as required by the CNS Technical Specifications in Section 4.2.B., the RHR System is placed in a configuration which precludes rapid restoration of the design function if needed to respond to a design basis event.

Further, the District's review concluded that the applicable surveillance procedures could not be revised to eliminate these undesirable conditions. Therefore, consistent with the surveillance frequency specified in the BWR-4 Standard Technical Specifications (NUREG-1202), the District requests that the NRC approve its request to revise the surveillance frequency of the RHR System initiation and pump and valve control logic from once/6 months to once/18 months. This change will require the surveillance testing only during cold shutdown conditions (reactor depressurized), and accordingly, remove the requirement to perform this surveillance testing at power operation.

II. DESCRIPTION OF CHANGES

The District requests that the Functional Test Frequency for the RHR System Initiation and RHR System Pump & Valve Control logic specified in Table 4.2.B (page 72) of the CNS Technical Specifications be changed from once/6 months to once/18 months as shown in the attached. This revision is requested to eliminate the requirement to perform this surveillance testing during power operations.

III. SIGNIFICANT HAZARDS DETERMINATION

10 CFR 50.91(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 10 CFR 50.92(c). The following analysis meets these requirements.

Evaluation of this Amendment with Respect to 10 CFR 50.92

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

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

Evaluation

This proposed change revises the functional testing interval for the RHR System initiation and pump and valve control logic from once/6 months to once/18 months, consistent with the most recent BWR-4 Standard Technical Specifications, NUREG-1202. As no hardware changes are being made, and no new mode of operation is being introduced, these changes do not increase the probability of an accident previously evaluated.

In addition, the District has determined during a recent review of its surveillance procedures that performing these surveillance procedures during reactor power operations is non-conservative in that during performance of this surveillance testing, the subject control systems are placed in a "non-standby" configuration which precludes rapid restoration of the RHR design function. Further, due to the design of the RHR control system, both trains of the RHR system must be tested at the same time. District review of the applicable surveillance procedures has also determined that the surveillance procedures cannot be revised to alleviate this condition. Therefore, since it is undesirable to perform these surveillances during reactor power operations, this proposed change will improve the overall availability of the RHR System and result in a reduction of the potential consequences of accidents previously evaluated.

Based on this discussion, the District has determined that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Evaluation

The proposed change consists of simply changing the surveillance frequency of the logic system for the RHR initiation and pump and valve control functions and does not involve any plant hardware changes or introduce any new mode of plant operation. Therefore, the proposed change does not create the possibility for a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change create a significant reduction in the margin of safety?

Evaluation

As discussed above, the proposed change increases the surveillance interval for the RHR initiation and pump and valve control logic. This change involves no hardware changes, and introduces no new mode of plant operation. Additionally, although increasing the interval for this surveillance testing, the overall net effect results in more conservative operation. This change was identified during District review of the CNS surveillance to determine if existing surveillance procedures place systems in a configuration which inhibits quick restoration of that function if needed to respond to design basis events during that testing period. The District has concluded that increasing the surveillance interval to require performance of this surveillance only while the reactor is depressurized increases the operational margin of safety. Therefore, the District finds that this proposed change does not create a significant reduction in the margin of safety.

IV. CONCLUSION

The District has evaluated the proposed changes described above against the criteria given in 10 CFR 50.92(c) in accordance with the requirements of 10 CFR 50.91(a)(1). This evaluation has determined that this proposed change 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, for the reasons detailed above, the District requests NRC approval of this Proposed Change 94.