



## Nebraska Public Power District

COOPER NUCLEAR STATION  
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321  
TELEPHONE (402)825-3811  
FAX (402)825-5211

NSD940726  
August 10, 1994

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

Gentlemen:

Subject: Cooper Nuclear Station  
Emergency Plan Revision  
NRC Docket No. 50-298, DPR-46

- References: (1) Letter from L. G. Kunc1 (NPPD) to USNRC Document Control Desk dated July 31, 1989. Subject: Proposed Change No. 73 to Technical Specifications Administrative Controls
- (2) Letter from Paul W. O'Connor (USNRC) to George A. Trevors (NPPD) dated March 19, 1990. Subject: Cooper Nuclear Station - Amendment No. 132 to Facility Operating License No. DPR-46 (TAC NO. 74208)

Pursuant to the requirements in 10 CFR 50.54(q), Nebraska Public Power District is submitting Revision 28 to the subject plan. The District concludes that these changes with the exception of Section 5.1.7 do not decrease the effectiveness of the Plan and that the Plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and 10 CFR 50 Appendix E.

Section 5.1.7 describes the availability of the Station Technical Advisor (STA). The current plan states the STA will be available on a 24-hour basis. The revision reduces the requirement for the STA's availability to exclude cold shutdown conditions. Therefore the revision to section 5.1.7 will not be implemented without NRC approval.

Attached, Reference 1, is the 10 CFR 50.92 evaluation for the proposed changes to the CNS Technical Specifications that specifies the availability of the STA. Also attached in Reference 2, is the NRC response to Technical Specification change request that specifies the STA requirements on shift.

Please remove and insert the appropriate pages as described on the attached listing.

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Document Control Desk  
August 10, 1994  
Page 2

If you have any questions concerning these revisions, please contact my office.

Sincerely,

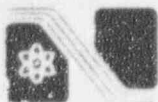


G. R. Horn  
Vice President - Nuclear

/rg  
Enclosures

cc: U. S. Nuclear Regulatory Commission (2)  
Regional Office - Region IV

NRC Senior Resident Inspector  
Cooper Nuclear Station



## Nebraska Public Power District

GENERAL OFFICE  
P.O. BOX 499, COLUMBUS, NEBRASKA 68602-0499  
TELEPHONE (402) 564-8561

NLS8900151

July 31, 1989

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

Gentlemen:

Subject: Proposed Change No. 73 to Technical Specifications  
Administrative Controls  
Cooper Nuclear Station  
NRC Docket No. 50-298, DPR-46

In accordance with the applicable provisions specified in 10 CFR 50, Nebraska Public Power District (District) requests that the Cooper Nuclear Station (CNS) Technical Specifications be revised to delete the listing of job position titles for the membership of the CNS Station Operations Review Committee and to incorporate requirements regarding the Shift Technical Advisor.

The Attachment contains a description of the proposed change, the attendant 10 CFR 50.92 evaluation, and the Technical Specification pages revised by the institution of this change. This proposed change has been reviewed by the necessary Safety Review Committees and incorporates all amendments to the CNS Facility Operating License through Amendment 128 issued February 21, 1989.

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).

~~8908080112~~ 9pp

July 31, 1989

Page 2

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

Sincerely,



L. G. Kuncel  
Nuclear Power Group Manager

LGK/mjb:1956.dmr  
Attachment

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

NRC Regional Office  
Region IV  
Arlington, TX

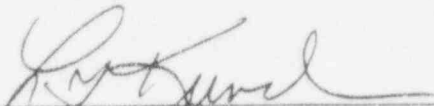
NRC Resident Inspector Office  
Cooper Nuclear Station

bc: NRC Distribution

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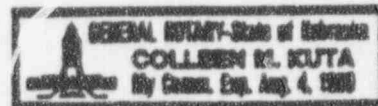
STATE OF NEBRASKA)  
                                  )SS  
PLATTE COUNTY      )

L. G. Kunc1, 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.

  
\_\_\_\_\_  
L. G. Kunc1

Subscribed in my presence and sworn to before me this 31st  
day of July, 1989.

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



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REVISED TECHNICAL SPECIFICATIONS  
ADMINISTRATIVE CONTROLS  
COOPER NUCLEAR STATION  
NRC DOCKET NO. 50-298, DPR-46

Revised Pages

219	221
219a	223
220	234

Reference: 1) Letter from L. G. Kuncel to USNRC dated March 20, 1989, "Proposed Change No. 45 to Technical Specifications - Removal of Organizational Changes"

INTRODUCTION

This request proposes to revise the Cooper Nuclear Station (CNS) Technical Specifications Section 6, "Administrative Controls." In particular, this proposed change involves the Station Operations Review Committee (SORC), changes to various job position titles throughout Section 6, and adding a requirement to have a Shift Technical Advisor (STA) available to the operating crew shift during certain periods of plant operation.

Changes to the organizational charts in Figures 6.1.1 and 6.1.2 of Technical Specifications are not included in this change request. These figures were previously requested to be deleted from CNS Technical Specifications in Reference 1 per the guidance given in Generic Letter 88-06.

DISCUSSION

CNS Technical Specification 6.2.1.A.1 currently lists, by job title, the various members that make up the SORC. Rather than revising the list each time a job title is changed, the District proposes to remove this detailed membership listing and replace it with a new format that establishes the following:

1. The minimum number of voting members that comprise SORC.
2. Specify, by job title, the SORC chairman.
3. Specify the disciplines and areas of expertise that must be possessed collectively by SORC.
4. References the applicable qualification standard that various SORC members must meet according to their respective job titles.
5. What constitutes a quorum.

The District believes this revision will eliminate the processing of license amendments resulting from routine administrative changes in job titles, yet captures the essence of SORC's ability to perform its function to review and audit station operation. The revision references ANSI N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants" which is already a commitment

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contained in Specification 6.1.4 regarding Plant Staff qualification. Currently, SORC members already meet the qualifications stated in ANSI N-18.1-1971, according to their respective job title, so there will be no reduction in the qualification standards for SORC members that results from this revision. The proposed areas of expertise also encompasses the currently listed job titles for voting SORC members and results in no decrease of SORC effectiveness.

An additional revision regarding SORC will change the title "Division Manager of Nuclear Operations" to "SORC Chairman" in two locations described below. Although the Division Manager of Nuclear Operations or his designated alternate is always the SORC Chairman, the Station Operations Review Committee members make their recommendations to the SORC Chairman position. This individual, although also the Division Manager of Nuclear Operations or a person acting in that capacity, receives the SORC recommendation because of their position as SORC Chairman. The proposed change will correct this minor detail.

TMI Action Plan Item I.A.1.1 dealt with providing a Shift Technical Advisor (STA) position to serve in an advisory capacity to the Shift Supervisor for accident and operating experience assessments. The District requests to revise the CNS Technical Specifications to incorporate requirements for the STA following guidance given in a July 2, 1980, NRC letter to all Boiling Water Reactor licensees. The STA is to be available except during cold shutdown as defined in Technical Specification 1.0, Part W (page 5 of Technical Specifications).

The District also requests to revise the CNS Technical Specifications to reflect changes in two job position titles. The first involves changing the title of Chemistry and Health Physics Supervisor to Radiological Manager for Specification 6.1.4 on page 219a. The duties and responsibilities of the Radiological Manager are similar to those of the old title and the Regulatory Guide 1.8, September 1975 qualification applies. The other position title change involves changing the title of Vice President-Nuclear to Nuclear Power Group Manager at various locations delineated below. The duties and responsibilities of the new position is comparable to that of the old. In Reference 1, the District's response to Generic Letter 88-06, the Nuclear Power Group Manager was designated, in proposed Technical Specifications, as the executive position that has corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

#### DESCRIPTION OF CHANGES

The proposed changes are as described below:

1. On page 219, Section 6.1.1 is being changed to designate the Senior Manager of Operations or the Senior Manager for Technical Support Services as the primary alternates, in that order, when the Division Manager of Nuclear Operations (DMNO) is unavailable. When neither of these individuals are available, the responsibilities of the DMNO would be delegated to a manager within the Nuclear Operations Division.
2. On page 219a, Specification 6.1.3.H has been added regarding the STA, and Specification 6.1.4 has been revised to incorporate the qualifications required for the STA.

3. On page 219a, in Specification 6.1.4, the title "Chemistry and Health Physics Supervisor" has been changed to "Radiological Manager."
4. On page 220, Specifications 6.2.1.A.1 and 6.2.1.A.3 have been revised to reflect the new proposed format for SORC membership and quorum.
5. On page 221, Specification 6.2.1.A.5.b and page 223, Specification 6.2.1.B.4.j, the title "Division Manager of Nuclear Operations" has been changed to "SORC Chairman."
6. The title "Vice President-Nuclear" has been changed to "Nuclear Power Group Manager" at the following locations:
  - a. Page 221, Specification 6.2.1.A.4.f  
       " 6.2.1.A.5.b  
       " 6.2.1.A.6  
       Page 223, Specification 6.2.1.B.5  
       " 6.2.1.B.6  
       Page 234, Specification 6.5.2

#### SIGNIFICANT HAZARDS DETERMINATION

10 CFR 50.91(a)(1) requires that licensee requests for operating license amendments be accomplished 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).

#### EVALUATION OF THIS REVISION WITH RESPECT TO 10 CFR 50.92

The proposed amendment has been judged to involve three changes:

1. Replacing of the detailed SORC membership listing with a new format that establishes the following:
  - a. The number of voting members that comprise SORC.
  - b. Specify by position, the SORC chairman.
  - c. Specify the disciplines and areas of expertise that must be possessed collectively by SORC.
  - d. References the applicable qualification standard that various SORC members must meet according to their respective job titles.
  - e. What constitutes a quorum.

Also, in two places, specify "SORC Chairman" in place of "Division Manager of Nuclear Operations."

2. Incorporating requirements for STA manning and qualifications into the CNS Technical Specifications.
3. Designated the Senior Manager of Operations and Senior Manager for Technical Support Services as the prime alternates for the Division Manager



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of Nuclear Operations and changing the job titles of the "Chemistry and Health Physics Supervisor" and "Vice President-Nuclear" to "Radiological Manager" and "Nuclear Power Group Manager," respectively.

- A. 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 any accident previously evaluated?

Evaluation:

1. The proposed change involves revising the format of the membership for the on-site review committee as described in the Administrative Controls Section of the plant's Technical Specifications. The proposed change will provide sufficient requirements on Committee membership to ensure its continuing effectiveness in performing review and audits of station operations.

The proposed change does not involve any material or procedural change to the plant and does not involve a significant increase in the probability or consequences of any previously evaluated accident.

2. The proposed change involves incorporating requirements for the availability and qualifications of the Shift Technical Advisor (STA) into the Station Technical Specifications and does not involve any material or procedural change to the plant that would affect the probability of any previously evaluated accident. The STA is to provide engineering expertise and advice to the operating crew regarding plant response to accidents and transients and, thus, provide assistance in mitigating the consequences of a previously evaluated accident. The proposed change will not involve a significant increase in the probability or consequences of any accident previously evaluated.

3. The proposed change revises several job position titles and adds the designation of two senior manager level positions as the primary alternates for the Division Manager of Nuclear operations. The changes are administrative in nature, will not decrease the organizational effectiveness, and do not affect plant operation or structures. The proposed change does not affect plant operation or structures and do not involve a significant increase in the probability or consequences of any 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:

1. The proposed change involves revising the format of the membership for the on-site review committee as described in the Administrative Controls Section of the plant's Technical Specifications. It does not introduce any new equipment or mode of plant operation that could create the possibility of a new or different kind of accident from any accident previously evaluated.

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2. The proposed change involves incorporating requirements for the availability and qualifications of the Shift Technical Advisor into the Station Technical Specifications. It does not involve any material or operational procedural change and does not create any new mode of plant operation. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
  3. The proposed change revises several job position titles and adds the designation of two senior manager level positions as the primary alternates for the Division Manager of Nuclear Operations. These changes are administrative in nature, will not decrease the organizational effectiveness, and do not affect plant operation or structures. The 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:

1. The proposed change involves revising the format of the membership for the on-site review committee as described in the Administrative Controls Section of the plant's Technical Specifications. It does not involve a change in any system operating or protective setpoint nor does it change the intended function of any system or component. The proposed change does not involve a significant reduction in the margin of safety.
2. The proposed change involves incorporating requirements for the availability and qualifications of the Shift Technical Advisor into the Station Technical Specifications. It does not change the intended function of any system or component and does not involve a change in any system operating or protective setpoint. The change involves incorporating additional requirements into the Technical Specifications and does not involve a significant increase in the margin of safety.
3. The proposed change revises several job position titles and adds the designation of two senior manager level positions as the primary alternates for the Division Manager of Nuclear Operations. The changes are administrative in nature and do not involve any change in system function and operating or protective setpoints. The change does not involve a significant reduction in the margin of safety.

B. Additional basis for proposed no significant hazards consideration determination:

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48FR 14870). Portions of this change (Part 2) are considered to fit the example, "(ii.) A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications: for example a more stringent surveillance requirement."

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6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION

6.1.1 Responsibility

The Division Manager of Nuclear Operations shall have the over-all fulltime onsite responsibility for the safe operation of the Cooper Nuclear Station. During periods when the Division Manager of Nuclear Operations is unavailable, this responsibility automatically shifts to either the Senior Manager of Operations, or the Senior Manager of Technical Support Services (in that order). During periods when none of these individuals are available, the responsibility may be delegated in writing to one of the managers in the Nuclear Operations Division.

6.1.2 Offsite

The portion of the Nebraska Public Power District management which relates to the operation of this station is shown in Figure 6.1.1.

6.1.3 Plant Staff - Shift Complement

The organization for conduct of operation of the station is shown in Fig. 6.1.2. The shift complement at the station shall at all times meet the following requirements. Note: Higher grade licensed operators may take the place of lower grade licensed or unlicensed operators.

- A. A licensed senior reactor operator (SRO) shall be present at the station at all times when there is any fuel in the reactor.
- B. A licensed reactor operator shall be in the control room at all times when there is any fuel in the reactor.
- C. Two licensed reactor operators shall be in the control room during all startup, shutdown and other periods involving significant planned control rod manipulations. A licensed SRO shall either be in the Control Room or immediately available to the Control Room during such periods.
- D. A licensed senior reactor operator (SRO) with no other concurrent duties shall be directly in charge of any refueling operation, or alteration of the reactor core.

A licensed reactor operator (RO) with no other concurrent duties shall be directly in charge of operations involving the handling of irradiated fuel other than refueling or reactor core alteration operations.

- E. An individual who has been trained and qualified in health physics techniques shall be on site at all times that fuel is on site.

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- F. Minimum crew size during reactor operation shall consist of four licensed reactor operators (two of whom shall be licensed SRO) and three unlicensed operators. Minimum crew size during reactor cold shutdown conditions shall consist of two licensed reactor operators (one of whom shall be licensed SRO) and one unlicensed operator.

In the event that any member of a minimum shift crew is absent or incapacitated due to illness or injury a qualified replacement shall be designated to report on-site within two hours.

- G. A Fire Brigade of at least 5 members shall be maintained at all times. This excludes the 3 members of the minimum shift crew necessary for safe shutdowns, and other personnel required for other essential functions during a fire emergency. Three Fire Brigade members shall be from the Operations Department and 2 support members may be from other departments inclusive of Security personnel.

Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.

- H. A Shift Technical Advisor shall be available, except during cold shutdown conditions, to serve in an advisory capacity to the shift crew on matters pertaining to the engineering aspects assuring safe operation of the plant.

#### 6.1.4 Plant Staff - Qualifications

The minimum qualifications, training, replacement training, and retraining of plant personnel at the time of fuel loading or appointment to the active positions shall meet the requirements as described in the American National Standards Institute N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants". The Radiological Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Sept. 1975; personnel qualification equivalency as stated in the Regulatory Guide may be proposed in selected cases. The minimum frequency of the retraining program shall be every two years. The training program shall be under the direction of the Training Manager.

- A. A training program for the fire brigade will be maintained under the direction of the Training Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code 1976, except for Fire Brigade training sessions which shall be held at least quarterly.

The training program requirements will be provided by a qualified fire protection engineer.

- B. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in plant design, and response and analysis of the plant for transients and accidents.

6.2.1 The organization and duties of committees for the review and audit of station operation shall be as outlined below:

A. Station Operations Review Committee (SORC)

1. SORC shall have a minimum of eight voting members comprised of the following:
  - a. Chairman: Division Manager of Nuclear Operations, or alternate
  - b. Individuals from the following disciplines:
    - o Operations
    - o Chemistry/Health Physics
    - o Maintenance
    - o Engineering
    - o Reactor Engineering
    - o Instrumentation and Control

The above, according to individual job title, shall meet the requirements as described in Sections 4.2., 4.3, and 4.4 of the American National Standards Institute N-18.1 1971, "Selection and Training of Personnel for Nuclear Power Plants."

Non-voting members may also serve on SORC to broaden its expertise in other areas (e.g., Quality Assurance).

2. Meeting Frequency: Monthly, and as required on call of the Chairman.
3. Quorum: SORC chairman plus such a number of other voting members to be equal to or greater than one-half the total authorized voting membership.
4. Responsibilities:
  - a. Review all proposed normal, abnormal, maintenance and emergency operating procedures specified in 6.3.1, 6.3.2, 6.3.3, and 6.3.4 and proposed changes thereto: and any other proposed procedures or changes thereto determined by any member to effect nuclear safety.
  - b. Review all proposed tests and experiments and their results, which involve nuclear hazards not previously reviewed for conformance with technical specifications. Submit tests which may constitute an unreviewed safety question to the NPPD Safety Review and Audit Board for review.
  - c. Review proposed changes to Technical Specifications.
  - d. Review proposed changes or modifications to station systems or equipment as discussed in the USAR or which involves an unreviewed safety question as defined in 10CFR50.59(c). Submit changes to equipment or systems having safety significance to the NPPD Safety Review and Audit Board for review.
  - e. Review station operation to detect potential nuclear safety hazards.

- f. Investigate all violations of Technical Specifications, including reporting evaluation and recommendations to prevent recurrence, to the Nuclear Power Group Manager and to the Chairman of the NPPD Safety Review and Audit Board.
- g. Perform special reviews and investigations and render reports thereon as requested by the Chairman of the Safety Review and Audit Board.
- h. Review all reportable events specified in Section 50.73 to 10CFR Part 50.
- i. Review drills on emergency procedures (including plant evacuation) and adequacy of communication with off site groups.
- j. Periodically review procedures required by Specifications 6.3.1, 6.3.2, 6.3.3, and 6.3.4 as set forth in administrative procedures.

5. Authority

- a. The Station Operations Review Committee shall be advisory.
- b. The Station Operations Review Committee shall recommend to the SORC Chairman approval or disapproval of proposals under items 4, a through e and j above. In case of disagreement between the recommendations of the Station Operations Review Committee and the Division Manager of Nuclear Operations, the course determined by the Division Manager of Nuclear Operations to be the more conservative will be followed. A written summary of the disagreement will be sent to the Nuclear Power Group Manager and to the NPPD Safety Review and Audit Board.
- c. The Station Operations Review Committee shall report to the Chairman of the NPPD Safety Review and Audit Board on all reviews and investigations conducted under items 4.f, 4.g, 4.h, and 4.i.
- d. The Station Operations Review Committee shall make determinations regarding whether or not proposals considered by the Committee involve unreviewed safety questions. This determination shall be subject to review by the NPPD Safety Review and Audit Board.

6. Records:

Minutes shall be kept for all meetings of the Station Operations Review Committee and shall include identification of all documentary material reviewed. Copies of the minutes shall be forwarded to the Chairman of the NPPD Safety Review and Audit Board and the Nuclear Power Group Manager within one month.

7. Procedures:

Written administrative procedures for Committee operation shall be prepared and maintained describing the method for submission and content of presentations to the committee, provisions for use of subcommittees, review and approval by members of written Committee evaluations and recommendations, dissemination of minutes, and such other matters as may be appropriate.



- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Appendix A Technical Specifications or the CNS Operating License.
- e. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All reportable events specified in Section 50.73 to 10CFR Part 50.
- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Minutes of meetings of the Station Operations Review Committee.
- j. Disagreement between the recommendations of the Station Operations Review Committee and the SORC Chairman.
- k. Review of events covered under e,f,g, and h above include reporting to appropriate members of management on the results of investigations and recommendations to prevent or reduce the probability of recurrence.

5. Authority: The NPPD Safety Review and Audit Board shall report to and be advisory to the Nuclear Power Group Manager on those areas of responsibility specified in Specifications 6.2.1.B.4 and 6.2.1.B.7.

6. Records:

Minutes shall be recorded for all meetings of the NPPD Safety Review and Audit Board and shall identify all documentary material reviewed. Copies of the minutes shall be forwarded to the Nuclear Power Group Manager and the Division Manager of Nuclear Operations, and such others as the Chairman may designate within one month of the meeting.

7. Audits:

Audits of selected aspects of plant operation shall be performed under the cognizance of SRAB with a frequency commensurate with their safety significance. Audits performed by the Quality Assurance Department which meet this specification shall be considered to meet the SRAB audit requirements if the audit results are reviewed by SRAB. A representative portion of procedures and records of the activities performed during the audit period shall be audited and, in addition, observations of performance of operating and maintenance activities shall be included. These audits shall encompass:



6.5.2 Reportable Events

A Reportable Event shall be any of those conditions specified in Section 50.73 to 10CFR Part 50. The NRC shall be notified and a report submitted pursuant to the requirements of Section 50.73. Each Reportable Event shall be reviewed by SORC and the results of this review shall be submitted to SRAB and the Nuclear Power Group Manager.

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

Reference (2)

March 19, 1990

Docket No. 50-298

Mr. George A. Trevors, Division  
Manager - Nuclear Support  
Nebraska Public Power District  
Post Office Box 499  
Columbus, Nebraska 68601-0499

Dear Mr. Trevors:

SUBJECT: COOPER NUCLEAR STATION - AMENDMENT NO. 132 TO FACILITY  
OPERATING LICENSE NO. DPR-46 (TAC NO. 74208)

The Commission has issued the enclosed Amendment No. 132 to Facility Operating License No. DPR-46 for the Cooper Nuclear Station. The amendment consist of changes to the Technical Specifications in response to your application dated July 31, 1989 as supplemented December 13, 1989.

The amendment changes the Technical Specifications to 1) replace the current Station Operations Review Committee (SORC) membership requirements which specify membership by position title with membership requirements that are based on areas of functional expertise, 2) incorporate a requirement to have a Shift Technical Advisor on shift, and 3) changes position titles and designates persons who would automatically assume the responsibilities of the Manager of Nuclear Operations if he is not available.

A copy of our related Safety Evaluation is enclosed. Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Paul W. O'Connor, Project Manager  
Project Directorate IV  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 132 to  
License No. DPR-46
2. Safety Evaluation

cc w/enclosures:  
See next page

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RECEIVED  
MAR 30 1990  
G. A. Trevors

Mr. George A. Trevors  
Nebraska Public Power District

Cooper Nuclear Station

cc:  
Mr. G. D. Watson, General Counsel  
Nebraska Public Power District  
P. O. Box 499  
Columbus, Nebraska 68601

Cooper Nuclear Station  
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Manager of Nuclear Operations  
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Brownville, Nebraska 68321

Dennis Grams, Director  
Nebraska Department of Environmental  
Control  
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Lincoln, Nebraska 68509-8922

Mr. Larry Bohlken, Chairman  
Nemaha County Board of Commissioners  
Nemaha County Courthouse  
1824 N Street  
Auburn, Nebraska 68305

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
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Brownville, Nebraska 68321

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
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Arlington, Texas 76011

Mr. Harold Borchart, Director  
Division of Radiological Health  
Department of Health  
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P. O. Box 95007  
Lincoln, Nebraska 68509-5007



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

NEBRASKA PUBLIC POWER DISTRICT  
DOCKET NO. 50-298  
COOPER NUCLEAR STATION  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 132  
License No. DPR-46

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Nebraska Public Power District (the licensee) dated July 31, 1989 as supplemented December 13, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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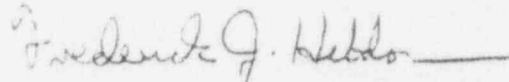
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-46 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No.132, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Frederick J. Hebdon, Director  
Project Directorate IV  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: March 19, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 132

FACILITY OPERATING LICENSE NO. DPR-46

DOCKET NO. 50-298

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

Pages

219  
219a  
220  
221  
223  
234

6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION

6.1.1 Responsibility

The Division Manager of Nuclear Operations shall have the over-all fulltime onsite responsibility for the safe operation of the Cooper Nuclear Station. During periods when the Division Manager of Nuclear Operations is unavailable, this responsibility automatically shifts to either the Senior Manager of Operations, or the Senior Manager of Technical Support Services (in that order). During periods when none of these individuals are available, the responsibility may be delegated in writing to one of the managers in the Nuclear Operations Division.

6.1.2 Offsite and Onsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- A. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the USAR.
- B. The Division Manager of Nuclear Operations shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- C. The Nuclear Power Group Manager shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- D. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.1.3 Plant Staff - Shift Complement

The shift complement at the station shall at all times meet the following requirements. Note: Higher grade licensed operators may take the place of lower grade licensed or unlicensed operators.

- A. A licensed senior reactor operator (SRO) shall be present at the station at all times when there is any fuel in the reactor.
- B. A licensed reactor operator shall be in the control room at all times when there is any fuel in the reactor.
- C. Two licensed reactor operators shall be in the control room during all startup, shutdown and other periods involving significant planned control rod manipulations. A licensed SRO shall either be in the Control Room or immediately available to the Control Room during such periods.

- D. A licensed senior reactor operator (SRO) with no other concurrent duties shall be directly in charge of any refueling operation, or alteration of the reactor core.
- A licensed reactor operator (RO) with no other concurrent duties shall be directly in charge of operations involving the handling of irradiated fuel other than refueling or reactor core alteration operations.
- E. An individual who has been trained and qualified in health physics techniques shall be on site at all times that fuel is on site.
- F. Minimum crew size during reactor operation shall consist of four licensed reactor operators (two of whom shall be licensed SRO) and three unlicensed operators. Minimum crew size during reactor cold shutdown conditions shall consist of two licensed reactor operators (one of whom shall be licensed SRO) and one unlicensed operator.
- In the event that any member of a minimum shift crew is absent or incapacitated due to illness or injury a qualified replacement shall be designated to report onsite within two hours.
- G. A Fire Brigade of at least 5 members shall be maintained at all times. This excludes the 3 members of the minimum shift crew necessary for safe shutdowns, and other personnel required for other essential functions during a fire emergency. Three fire Brigade members shall be from the Operations Department and 2 support members may be from other departments inclusive of Security personnel.
- Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.
- H. The Operations Supervisor, Shift Supervisor and Control Room Supervisor shall hold a senior reactor operator license. The Unit Operators shall hold, at a minimum, a reactor operator license.
- I. A Shift Technical Advisor shall be available, except during cold shutdown conditions, to serve in an advisory capacity to the shift crew on matters pertaining to the engineering aspects assuring safe operation of the plant.

#### 6.1.4 Plant Staff - Qualifications

The minimum qualifications, training, replacement training, and retraining of plant personnel at the time of fuel loading or appointment to the active positions shall meet the requirements as described in the American National Standards Institute N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants". The Radiological Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Sept. 1975; personnel qualification equivalency as stated in the Regulatory Guide may be proposed in selected cases. The minimum frequency of the retraining program shall be every two years. The training program shall be under the direction of the Training Manager.

- A. A training program for the fire brigade will be maintained under the direction of the Training Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code 1976, except for Fire Brigade training sessions which shall be held at least quarterly.

The training program requirements will be provided by a qualified fire protection engineer.

- B. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in plant design, and response and analysis of the plant for transients and accidents.



## 6.2 REVIEW AND AUDIT

6.2.1 The organization and duties of committees for the review and audit of station operation shall be as outlined below:

### A. Station Operations Review Committee (SORC)

1. SORC shall have a minimum of eight voting members comprised of the following:

- a. Chairman: Division Manager of Nuclear Operations, or alternate
- b. Individuals from the following disciplines:
  - Operations
  - Radiological (Chemistry/Health Physics)
  - Maintenance
  - Engineering
  - Reactor Engineering
  - Instrumentation and Control

The above, according to individual job title, shall meet the requirements as described in Sections 4.2, 4.3.1, or 4.4 of the American National Standards Institute N-18.1 1971. "Selection and Training of Personnel for Nuclear Power Plants."

Non-voting members may also serve on SORC to broaden its expertise in other areas (e.g., Quality Assurance).

All alternate members shall be appointed in writing by the SORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SORC at any one time.

- 2. Meeting Frequency: Monthly, and as required on call of the Chairman.
- 3. Quorum: SORC chairman plus such a number as to constitute a majority of the voting members.
- 4. Responsibilities:
  - a. Review all proposed normal, abnormal, maintenance and emergency operating procedures specified in 6.3.1, 6.3.2, 6.3.3, and 6.3.4 and proposed changes thereto; and any other proposed procedures or changes thereto determined by any member to effect nuclear safety.
  - b. Review all proposed tests and experiments and their results, which involve nuclear hazards not previously reviewed for conformance with technical specifications. Submit tests which may constitute an unreviewed safety question to the NPPD Safety Review and Audit Board for review.
  - c. Review proposed changes to Technical Specifications.
  - d. Review proposed changes or modifications to station systems or equipment as discussed in the USAR or which involves an unreviewed safety question as defined in 10CFR50.59(c). Submit changes to equipment or systems having safety significance to the NPPD Safety Review and Audit Board for review.
  - e. Review station operation to detect potential nuclear safety hazards.

- f. Investigate all violations of Technical Specifications, including reporting evaluation and recommendations to prevent recurrence, to the Nuclear Power Group Manager and to the Chairman of the NPPD Safety Review and Audit Board.
- g. Perform special reviews and investigations and render reports thereon as requested by the Chairman of the Safety Review and Audit Board.
- h. Review all reportable events specified in Section 50.73 to 10CFR Part 50.
- i. Review drills on emergency procedures (including plant evacuation) and adequacy of communication with off site groups.
- j. Periodically review procedures required by Specifications 6.3.1, 6.3.2, 6.3.3, and 6.3.4 as set forth in administrative procedures.

5. Authority

- a. The Station Operations Review Committee shall be advisory.
- b. The Station Operations Review Committee shall recommend to the SORC Chairman approval or disapproval of proposals under items 4, a through e and j above. In case of disagreement between the recommendations of the Station Operations Review Committee and the Division Manager of Nuclear Operations, the course determined by the Division Manager of Nuclear Operations to be the more conservative will be followed. A written summary of the disagreement will be sent to the Nuclear Power Group Manager and to the NPPD Safety Review and Audit Board.
- c. The Station Operations Review Committee shall report to the Chairman of the NPPD Safety Review and Audit Board on all reviews and investigations conducted under items 4.f, 4.g, 4.h, and 4.i.
- d. The Station Operations Review Committee shall make determinations regarding whether or not proposals considered by the Committee involve unreviewed safety questions. This determination shall be subject to review by the NPPD Safety Review and Audit Board.

6. Records:

Minutes shall be kept for all meetings of the Station Operations Review Committee and shall include identification of all documentary material reviewed. Copies of the minutes shall be forwarded to the Chairman of the NPPD Safety Review and Audit Board and the Nuclear Power Group Manager within one month.

7. Procedures:

Written administrative procedures for Committee operation shall be prepared and maintained describing the method for submission and content of presentations to the committee, provisions for use of subcommittees, review and approval by members of written Committee evaluations and recommendations, dissemination of minutes, and such other matters as may be appropriate.

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
  - d. Proposed changes to Appendix A Technical Specifications or the CNS Operating License.
  - e. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
  - f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
  - g. All reportable events specified in Section 50.73 to 10CFR Part 50.
  - h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
  - i. Minutes of meetings of the Station Operations Review Committee.
  - j. Disagreement between the recommendations of the Station Operations Review Committee and the SORC Chairman.
  - k. Review of events covered under e,f,g, and h above include reporting to appropriate members of management on the results of investigations and recommendations to prevent or reduce the probability of recurrence.
5. Authority: The NPPD Safety Review and Audit Board shall report to and be advisory to the Nuclear Power Group Manager on those areas of responsibility specified in Specifications 6.2.1.B.4 and 6.2.1.B.7.
6. Records:
- Minutes shall be recorded for all meetings of the NPPD Safety Review and Audit Board and shall identify all documentary material reviewed. Copies of the minutes shall be forwarded to the Nuclear Power Group Manager and the Division Manager of Nuclear Operations, and such others as the Chairman may designate within one month of the meeting.
7. Audits:
- Audits of selected aspects of plant operation shall be performed under the cognizance of SRAB with a frequency commensurate with their safety significance. Audits performed by the Quality Assurance Department which meet this specification shall be considered to meet the SRAB audit requirements if the audit results are reviewed by SRAB. A representative portion of procedures and records of the activities performed during the audit period shall be audited and, in addition, observations of performance of operating and maintenance activities shall be included. These audits shall encompass:

#### 6.5.2 Reportable Events

A Reportable Event shall be any of those conditions specified in Section 50.73 to 10CFR Part 50. The NRC shall be notified and a report submitted pursuant to the requirements of Section 50.73. Each Reportable Event shall be reviewed by SORC and the results of this review shall be submitted to SRAB and the Nuclear Power Group Manager.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO.132 TO FACILITY OPERATING LICENSE NO. DPR-46  
NEBRASKA PUBLIC POWER DISTRICT  
COOPER NUCLEAR STATION  
DOCKET NO. 50-298

1.0 INTRODUCTION

By letter dated July 31, 1989 and a supplement dated December 13, 1989, the Nebraska Public Power District (NPPD) (the licensee) requested an amendment to Facility Operating License No. DPR-46 for the Cooper Nuclear Station. The proposed amendment would change Technical Specification Section 6.0, "Administrative Controls" by:

1. Replacing the current Station Operations Review Committee (SORC) membership requirements, which specify SORC membership by position title, with membership requirements that are based on areas of functional expertise and adding a specification that requires the individuals serving in these positions to meet certain requirements contained in the American National Standards Institute Standard N-18.1 1971, "Selection and Training of Nuclear Power Plant Personnel".
2. Incorporating requirements for Shift Technical Advisor (STA) manning and qualifications into the Technical Specifications.
3. Designating the Senior Manager of Operations and Senior Manager for Technical Support Services as the prime alternates for the Division Manager of Nuclear Operations and changing the position titles of the "Chemistry and Health Physics Supervisor" and "Vice-President-Nuclear" to "Radiological Manager" and "Nuclear Power Group Manager," respectively.

2.0 DISCUSSION AND EVALUATION

2.1 Station Operations Review Committee Membership

The current wording of Specification 6.2.1.A of the Cooper Nuclear Station Technical Specifications require that the membership of the Station Operations Review Committee (SORC) include the following individuals:

- a. Chairman: Division Manager of Nuclear Operations
- b. Technical Staff Manager
- c. Operations Manager

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- d. Technical Manager
- e. Operations Supervisor
- f. Maintenance Supervisor
- g. Instrument and Control Supervisor
- h. Chemistry and Health Physics Supervisor
- i. Plant Engineering Supervisor
- j. Operations Engineering Supervisor
- k. Computer Applications Supervisor
- l. Maintenance Manager
- m. Quality Assurance Manager - non-voting member.

Collectively, the experience of the individuals assigned to these positions provides a multi-disciplined background and expertise in the areas of nuclear power plant operations, chemistry/health physics, equipment and plant maintenance, engineering, nuclear reactor engineering, and instrumentation and control systems.

The licensee has, on occasion, made changes to the onsite organization that have resulted in changes to the titles of the positions specified above. In some of these cases, although there was no change to the expertise or experience represented on the SORC, it was necessary for the licensee to propose a change to the technical specifications and for the NRC staff to review that proposed change and issue an amendment to the Cooper Nuclear Station Operating License.

The licensee has proposed to replace the current detailed listing of position titles used in Specifications 6.2.1.A with the following listing of disciplines that must be represented on the SORC:

- ° Operations
- ° Radiological (Chemistry/Health Physics)
- ° Maintenance
- ° Reactor Engineering
- ° Instrumentation and Control

Additionally, NPPD has proposed the addition of a specification that requires that those persons serving on the SORC must meet the requirements described in Sections 4.2, or 4.3.1, or 4.4 of the American National Standards Institute (ANSI) N-18.1 1971, "Selection and Training of Personnel for Nuclear Power Plants."

#### Evaluation

The staff has reviewed the licensee's proposed modification to the manner that the SORC membership is specified and concludes that operation with the technical disciplines specified in the proposed change, when taken in conjunction with the additional limitations included from ANSI N-18.1, will provide an equivalent level of technical expertise to that of the current SORC, meets the acceptance criteria of Section 13.4 of NUREG-0800, the Standard Review Plan, and is acceptable to the staff.

#### 2.2 Shift Technical Advisor

NPPD has requested the addition of Specification 6.1.3.H that requires that a Shift Technical Advisor shall be available, except during cold shutdown conditions, to serve in an advisory capacity to the shift crew on matters pertaining to the engineering aspects assuring safe operation of the plant.

#### Evaluation

The NRC staff approved the licensee's Shift Technical Advisor (STA) training program by our letter dated April 1, 1982 and STAs have been on shift at Cooper Nuclear Station since that date. The issue of Technical Specifications for the STA remained open at that time pending subsequent correspondence from the staff.

The licensee proposal to require that the STA be present on shift in all modes of reactor operation except cold shutdown, is consistent with the Standard Technical Specifications that the staff provided to licensees for guidance.

Based on the above discussion, the staff concludes that the proposed wording is acceptable.

#### 2.3 Designation of Alternates and Position Title Changes

NPPD has proposed the following editorial and administrative changes:

- ° The automatic delegation of the responsibilities of the Division Manager of Nuclear Operations to the Senior Manager of Operations or the Senior Manager of Technical Support Services (in that order).
- ° The change of the title of the "Chemistry and Health Physics Supervisor" to "Radiological Manager".



- ° The change of the title of the "Vice President-Nuclear" to "Nuclear-  
Power Group Manager".
- ° The change of the Title "Division Manager of Nuclear Operations"  
to "SORC Chairman" in Specifications 6.2.1.A.3, 6.2.1.A.5.b, and  
6.2.1.A.7.j.

### Evaluation

The proposed changes listed above are editorial and administrative in nature. These changes provide additional clarification to the specifications and update the specifications to incorporate administrative changes that have taken place in the NPPD organization. Based on the above the staff finds these changes acceptable

### 3.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: March 19, 1990

Principal Contributors: Fred Allenspach  
Paul W. O'Connor



**Narrative Descriptions**  
**Emergency Plan Revision #28**

The changes included in this revision to the Emergency Plan regard the NPG Organization changes. Specifically the addition of the Site Manager, the addition of the Emergency Preparedness Manager, and the transfer of reporting area for the Nuclear Licensing and Safety Manager.

Section 5.0

- p. 5-1 - Reflects NPG organizational changes which includes the addition of the Site Manager.
- p. 5-4 - Add the Emergency Preparedness Manager to help support the Senior Manager of Site Support.
- p. 5-5 - Add the Emergency Preparedness Manager responsibilities description.
- p. 5-5 - Add Nuclear Licensing and Safety Manager position to support the Senior Division Manager of Safety Assessment . The position was moved from the Division Manager of Nuclear Support.
- Delete the SRAB Administrator position, the duties have been transferred to the Nuclear Licensing and Safety Department.
- p. 5-6 - SRAB Administrator position, the duties have been transferred to the Nuclear Licensing and Safety Department. The description of the SRAB is deleted, it was included in the Emergency Plan to explain the position of the SRAB Administrator. The SRAB Administrator position is no longer a direct report for the Senior Division Manager of Safety Assessment therefore the reference is deleted.
- Add the position description of the Nuclear Licensing and Safety Manager. The position was moved from the Division Manager of Nuclear Support to the Senior Nuclear Division Manager Safety Assessment.
- p. 5-7 - Paragraphs moved due to addition of text on preceding pages.
- p. 5-8 - Delete Nuclear Licensing and Safety and Emergency Preparedness function from Nuclear Support. These functions were transferred to the Senior Division Manager of Safety Assessment and Senior Manager of Site Support respectively.
- p. 5-9 - Delete Nuclear Licensing and Safety Manager, transferred to Senior Division Manager of Safety Assessment.
- Delete Emergency Preparedness, transferred to Senior Manager of Site Support.
- The change to the STA's availability makes the Emergency Plan consistent with the CNS Technical Specification.
- p. 5-36 to 5-47 - All new organization charts, representing the NPG reorganization.

## Section 8.0

- p. 8-3
  - Emergency Preparedness Supervisor responsibilities transferred to Emergency Preparedness Manager.
  - The documentation for training the emergency preparedness staff is maintained by the NPPD Corporate Training Department, not the Nuclear Training Department.
- p. 8-6
  - Emergency Preparedness Supervisor responsibilities transferred to Emergency Preparedness Manager.
- p. 8-9
  - Senior Manager of Site Support replaces Division Manager of Nuclear Support on exercise Management Review Board.
  - Emergency Preparedness Supervisor responsibilities transferred to Emergency Preparedness Manager.
- p. 8-10
  - Emergency Preparedness Supervisor responsibilities transferred to Emergency Preparedness Manager.
- p. 8-12
  - Reflect changes in NPG organization which adds the Emergency Preparedness Manager.
- p. 8-13
  - Clarify responsibilities of Emergency Preparedness Department organization.
  - Add the Operations Support Center (OSC) to the list of facilities that must be in a state of readiness.
- p. 8-14
  - Delete text about assisting the Emergency Preparedness Supervisor. This was to clarify responsibilities of an Emergency Preparedness Specialist at the Columbus General Office. This section of text describes what the Emergency Preparedness Department staff does to support the Emergency Preparedness Manager.
- p. 8-15
  - Emergency Preparedness Supervisor responsibilities transferred to Emergency Preparedness Manager.
- p. 8-16
  - Emergency Preparedness Supervisor responsibilities transferred to Emergency Preparedness Manager.

## Section 9.0

- p. 9-4
  - Reflect changes of NPG reorganization, added Site Manager and the reporting relationship to the Vice President - Nuclear.
  - The Plant Manager reports to the Site Manager instead of the Vice President - Nuclear.
- p. 9-7
  - Delete SRAB Administrator and add Nuclear Licensing and Safety Manager as reports to the Senior Division Manager of Safety Assessment. The SRAB Administrator duties have been transferred to the Nuclear Licensing and Safety Department. The Nuclear Licensing and Safety Manager reporting was moved from the Division Manager of Nuclear Support to the Senior Division Manager of Safety Assessment.

- p. 9-7 - Add the Nuclear Licensing and Safety Manager position description. The Nuclear Licensing and Safety Manager reporting was moved from the Division Manager of Nuclear Support to the Senior Division Manager of Safety Assessment.
- SRAB Administrator position, the duties have been transferred to the Nuclear Licensing and Safety Department. The description of the SRAB is deleted, it was included in the Emergency Plan to explain the position of the SRAB Administrator. The SRAB Administrator position is no longer a direct report for the Senior Division Manager of Safety Assessment therefore the reference is deleted.
- p. 9-8 - Change the reporting of the Senior Manager of Site Support from the Vice President - Nuclear to the Site Manager.
- Add Emergency Preparedness Manager to the list of positions that support the Senior Manager of Site Support.
- p. 9-9 - Add Emergency Preparedness Manager position description.
- p. 9-10 - Paragraphs moved due to addition of text on preceding pages.
- p. 9-11 - Delete Nuclear Licensing and Safety Manager and Emergency Preparedness Supervisor these positions were moved to the Senior Division Manager of Safety Assessment and Senior Manager of Site Support respectively.
- p. 9-12 - Delete position descriptions for Nuclear Licensing and Safety Manager and Emergency Preparedness Supervisor these positions were moved to the Senior Division Manager of Safety Assessment and Senior Manager of Site Support respectively.
- p. 9-13 to p. 9-16 - Paragraphs moved due to addition of text on preceding pages.
- p. 9-17 - Add Site Manager, Nuclear Licensing and Safety Manager, and Emergency Preparedness Manager boxes.
- Add dotted line for the SRAB to report to the Vice President - Nuclear
- p. 9-18 - Delete Nuclear Licensing and Safety Manager and Emergency Preparedness Manager boxes.