

## Nebraska Public Power District

GENERAL OFFICE  
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499  
TELEPHONE (402) 564-8561

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February 25, 1983

Office of Nuclear Reactor Regulation  
Operating Reactors Branch No. 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Mr. D. B. Vassallo, Chief

Subject: Proposed Change to Technical Specifications -  
SORC/SRAB Review Frequency  
Cooper Nuclear Station  
NRC Docket No. 50-298, DPR-46

- Reference: 1) Letter from D. G. Eisenhower to All Licensees dated October 1, 1982, "Inconsistency Between Requirements of 10CFR50.54(t) and Standard Technical Specifications for Performing Audits of Emergency Preparedness Programs."
- 2) Letter from D. G. Eisenhower to All Licensees dated October 30, 1982, "Inconsistency Between Requirements of 10CFR73.40(d) and Standard Technical Specifications for Performing Audits of Safeguards Contingency Plans (Security Plan)."

Dear Mr. Vassallo:

In accordance with the applicable provisions specified in 10CFR50, Nebraska Public Power District requests that the Technical Specifications for Cooper Nuclear Station (CNS) be revised as indicated on the enclosed revised pages and as discussed below.

References 1 and 2 required that the District perform independent review of the subject programs at 12-month intervals. The present CNS Technical Specifications require that the Safety Review and Audit Board (SRAB) perform an independent review at a 24-month interval, while the CNS Emergency Plan and Security Plan require that the Quality Assurance Department perform an independent review at 12-month intervals. In discussions with the staff, the District was requested to revise the SRAB review requirements of the Technical Specifications so that confusion would not exist between QA and SRAB reviews and regulatory requirements. This revision has been performed in accordance with the staff's request and the Standard Technical

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Specifications for General Electric Boiling Water Reactors (NUREG-0123, Revision 3). Format and editorial changes are also proposed to bring the Administrative Control Section (Section 6.0) of the CNS Technical Specifications into closer conformance with the Standard Technical Specifications. This change will allow for easier revision in the future at the request of the NRC as well as alleviating confusion as to interpretation.

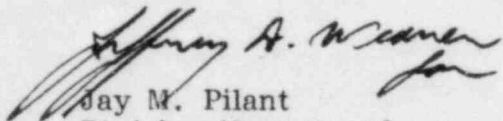
These changes have been reviewed by the necessary safety review committees. As stated in References 1 and 2, because this Technical Specification is clarifying and made at the request of the Commission, the District is not required to remit a license fee for the change.

A marked-up copy of the present Technical Specifications are being sent directly to our Project Manager to assist him in assessing the editorial changes involved.

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

In addition to three signed originals, 37 copies are also submitted for your use.

Sincerely,

  
Jay M. Pilant  
Division Manager of  
Licensing & Quality Assurance

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Attachment