Nebraska Public Power District

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NLS8400137

May 7, 1984

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

Attention: Mr. Domenic B. Vassallo, Chief

Reference: 1) Letter from D. B. Vassallo to J. M. Pilant dated January 20, 1984, "Mark I Containment Long-Term Program"

Attachment: 1) Evaluation of Technical Specification Changes with Respect to 10CFR50.92

Dear Mr. Vassallo:

Subject: Proposed Change No. 13 to Technical Specifications
Mark I Containment Modifications
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

Reference (1) requested Nebraska Public Power District (NPPD) to submit any changes to the facility's Technical Specifications required as a result of Mark I containment modifications. In accordance with the applicable provisions specified in 10CFR50, NPPD requests that the Technical Specifications for Cooper Nuclear Station (CNS) be revised to incorporate these changes. An evaluation of the proposed change with respect to the requirements of 10CFR50.92 and the applicable revised Technical Specification pages are contained in the attachment.

This proposed change incorporates all amendments to the CNS Facility Operating License through Amendment 85 issued March 20, 1984.

By copy of this letter and attachment, the appropriate State of Nebraska Official is being notified in accordance with 10CFR50.91(b).

This change has been reviewed by the necessary Safety Review Committees and payment for a Class III amendment in the amount of $4,000 is submitted.

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

In addition to three signed originals, 40 copies are also submitted for your use.

Sincerely,

L. G. Kuncl
Assistant General Manager

LGK/grs:emz8/3
Attachment

cc: H. E. Simmons
Department of Health
State of Nebraska

STATE OF NEBRASKA)
)ss
PLATTE COUNTY)

L. G. Kuncl, 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. Kuncl

Subscribed in my presence and sworn to before me this 7th day of May, 1984.

Colleen M. Kuta
NOTARY PUBLIC

COLLEEN M. KUTA
GENERAL
NOTARY
COMMISSION
EXPIRES
AUG. 4, 1985
STATE OF NEBRASKA

Revised Technical Specifications for
Mark I Containment Modifications

Revised Pages:	65	159	176	179
	66	162a	177	180
	80	178	181	184

167a (deleted)

Reference (1) stated that the NRC staff completed a postimplementation audit review of the CNS Plant Unique Analysis Report (PUAR) and concluded that the PUAR verified that the completed containment modifications have restored the original design safety margin to the Mark I containment. The PUAR states in Section 2 that drywell-to-wetwell pressure differentials of 1.0 psid and 0.0 psid were both used as initial conditions in the containment structural evaluations and that although the 0.0 psid differential causes higher loads in some cases, the design margins are still met. An enclosure to Reference (1) (Safety Evaluation Report related to Mark I Containment Long-Term Program) concluded that the pool dynamic loads utilized by NPPD in the PUAR were conservative and acceptable.

Based on the above, NPPD requests a revision to the Technical Specifications to delete the requirements to establish and maintain a drywell-suppression chamber differential pressure during reactor operation. Following from this, the limiting condition of operation and surveillance requirements for the drywell-suppression chamber differential pressure instrumentation have been deleted from the Technical Specifications. The maximum suppression pool water volume as stated in Technical Specification 3.7.A.1 has also been changed to 91,100 $ft.^3$ to be consistent with the value used in the Mark I evaluations and in the updated Safety Analysis Report. In addition, the bases for Technical Specifications 3.7.A and 4.7.A have been reformatted to more closely follow the order of items addressed in the Technical Specifications.

Additionally, the District requests that Section 4.7.A.2.g be deleted from the Technical Specifications to remove the requirement that the containment be continuously monitored to detect gross leakage of nitrogen. This request is based on the following:

1. The issue is covered in earlier parts of 4.7.A.2 under integrated and local leak rate testing in accordance with Appendix J of 10CFR50.

2. The requirement as written is ambiguous and subject to varying interpretations in that no quantitative criteria are given as what constitutes gross leakage and how long the monitoring system can be taken out of service for maintenance.

3. The proposed change conforms to NUREG-0123, Revision 3, Standard Technical Specification 4.6 which does not require continuous monitoring for gross leakage of the primary containment while it is inerted.

4. No bases are given for this surveillance requirement. It was added to the Technical Specifications when the Atmospheric Containment Atmosphere Dilution (ACAD) system was being licensed.

Evaluation of this Revision with Respect to 10CFR50.92

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 PUAR submitted by NPPD analyzed a drywell-wetwell pressure differential of 0 psid for three categories of Loss-of-Coolant Accident (LOCA) including the Design Base Accident of a double-ended guillotine break of the recirculation pump suction line at the reactor vessel. It concluded that no significant increase in the consequences of a LOCA occurred if drywell-wetwell differential pressure was changed from 1.0 psid to 0 psid. Because drywell-wetwell differential pressure and not continuously monitoring the primary containment for gross leakage does not affect the probability of a LOCA occurrence, the proposed change does not involve a significant increase in the probability or consequence 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:

   Because the proposed change does not introduce any new mode of operation, the possibility of an accident of a different type than analyzed in the Final Safety Analysis Report would not result from the change; therefore, the proposed license amendment 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 a margin of safety?

   Evaluation:

   The PUAR for the Mark I Containment Report states that all containment components have sufficient design margins for all loads assuming zero pressure differential between the wetwell and drywell, so the proposed change to delete the requirement for drywell-wetwell differential pressure does not involve a significant reduction in a margin of safety.

   The primary containment is continuously supplied with a supply of inerting nitrogen to handle any leakage that might develop. In addition, gross leakage would be more likely to occur during integrated and local leak rate testing when the applied pressure is far in excess of what would be present during normal operating conditions. These leak rate tests are performed at specified intervals with stringent acceptance criteria in accordance with Regulations and the Technical Specifications. The District believes this change to delete continuous primary containment monitoring clarifies the surveillance requirements on primary containment integrity and is in agreement with the NRC's Standard Technical Specifications and does not involve a significant reduction in a margin of safety.