



## Nebraska Public Power District

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NLS9100459  
July 19, 1991

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

Gentlemen:

Subject: Proposed Change No. 95 to Technical  
Specifications  
Reactor Water Level Figure, Secondary  
Containment Integrity Test, Organization  
Structure  
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 purpose of this change is to provide a new format for the presentation of information on Page 10 of the Technical Specifications, Figure 2.1.1, Reactor Water Level Indication Correlation.

There are two (2) additional Technical Specification changes proposed with the submittal. The first change addresses an apparent conflict between Surveillance Requirement 4.1.C.1.C. and 4.7.C, BASES, which address the performance of tests to determine secondary containment ability to maintain a 1/4 inch water vacuum prior to refueling. The second change revises Section 6.1.1 of the Technical Specifications to specify, by job title, an additional individual to assume the responsibility of the Division Manager of Nuclear Operations in his absence.

The attached contains a description of the proposed change, the attendant 10 CFR 50.92 evaluation, and the CNS Technical Specification pages (including markup for Page 10) 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 144 issued July 17, 1991.

In addition to the signed original, 37 copies are also submitted for your use. By copy of this letter and attachment the

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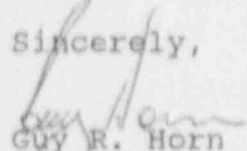
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Page 2 of 3  
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appropriate State of Nebraska official is being notified in accordance with 10 CFR 50.91(b)(1). Copies to the NRC Region IV Office and CNS Resident Inspector are also being sent in accordance with 10 CFR 50.4(b)(2).

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

Sincerely,

  
Guy R. Horn  
Nuclear Power Group Manager

GRH/dnm:dmr 13129  
Attachment

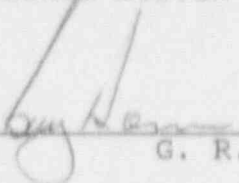
cc: H. R. Borchert  
Department of Health  
State of Nebraska

NRC Regional Office  
Region IV  
Arlington, TX

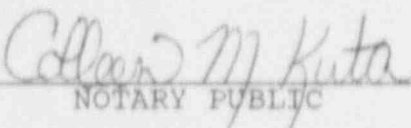
NRC Resident Inspector  
Cooper Nuclear Station

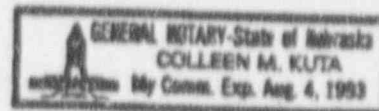
STATE OF NEBRASKA )  
 ) ss  
PLATTE COUNTY )

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.

  
\_\_\_\_\_  
G. R. Horn

Subscribed in my presence and sworn to before me this 19th day  
of July, 1991.

  
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NOTARY PUBLIC



REVISED TECHNICAL SPECIFICATIONS  
PROPOSED CHANGE NO. 95

Revised Pages

10  
182  
219

I. INTRODUCTION

The Nebraska Public Power District (District) requests that the NRC approve Proposed Change No. 95 to the CNS Technical Specifications. Proposed Change No. 95 involves three separate changes, as follows:

- a. Figure 2.1.1, Page 10, Reactor Water Level Indication Correlation

Revise figure to present existing information and new information in a format that would be easier to understand and more user friendly.

- b. Page 182, Paragraph 4.7.C, BASES.

Delete the third sentence addressing the performance of tests to demonstrate secondary containment capacity prior to the time primary containment is opened for refueling. This proposed change is based on recommendations from the Project Director, Region IV, NRC, per memorandum dated March 28, 1988 to CNS.

- c. Page 219, Paragraph 6.1.1, ADMINISTRATIVE CONTROLS/ORGANIZATION/Responsibility

Revise the second sentence to include the Senior Manager of Staff Support as an additional alternate to assume full time site responsibility of CNS in the absence of the Division Manager of Nuclear Operations (DMNO).

II. DESCRIPTION OF CHANGES

The first of the three changes affects Figure 2.1.1 of the CNS Technical Specifications. This figure, entitled, Reactor Water Level Indication Correlation, provides the Technical Specification user with a basic overview of various water level trip settings and associated level transmitters, indications, and switches. Currently, this figure contains many level references on one page with an intermixture of safety related trip settings along with nonsafety related indications. Because of the extensive amount of information contained in Page 10, the District proposes a revision to Page 10 which effectively "human factors" existing information, and adds illustrations for three additional instrument level readings.

NPPD proposes a revision to this figure that would:

- a. Move all GEMAC and ROSEMOUNT level indication to the left of the reactor vessel illustration, and move all YARWAY and BARTON indication and trip settings to the right of the reactor vessel illustration.
- b. Add a note stating that illustration of individual instrument level readings are not to scale in relation to reactor vessel level markings, except at instrument zero reference or TAF reference, as applicable.
- c. Add three level indications displaying water level for LI-85 Wide Range (ROSEMOUNT), Containment Spray Interlock (YARWAY), and ADS Permissive (YARWAY).
- d. Reidentify each of the seven instrument level readings to better identify their function, associated instrumentation, and trip settings, where applicable.

To aid in the identification of individual changes, a marked up copy of the current Page 10, Figure 2.1.1, has been included for review with this proposed change. Each major portion of the figure has been assigned a letter (A, B, C, etc.) which corresponds to the individual clouded areas (changes) on the proposed Figure 2.1.1.

The second change associated with Proposed Change No. 95 would revise Paragraph 4.7.C, BASES, page 182, of the CNS Technical Specifications. This paragraph addresses the reasons for the initiation of the reactor building isolation and operation of the standby gas treatment system (SBGT). The paragraph currently requires testing that demonstrates secondary containment integrity by initiating reactor building isolation and operating the SBGT system prior to the time the primary containment is opened for refueling. However, Surveillance Requirement 4.7.C.1.c states "Secondary containment capability to maintain  $\frac{1}{4}$  inch of water vacuum under calm winds (2-5 mph) conditions with a filter train flowrate of not more than 100% of building volume per day, shall be demonstrated at each refueling outage prior to refueling." The statement in the BASES implies that secondary containment integrity be established at the time (opening primary containment) when it is not required by the Technical Specifications.

The apparent conflict between Surveillance Requirement 4.7.C.1.c and Paragraph 4.7.C, BASES, was identified on March 7, 1988, and documented in memorandum from the NRC for the docket file dated March 28, 1988. Per the recommendation of the above referenced memorandum, the District proposes that Paragraph 4.7.C, BASES, be revised to delete the statement addressing the performance of tests to demonstrate secondary containment integrity prior to opening primary containment for refueling.

The final proposed change revises Paragraph 6.1.1, Page 219. The purpose of this change is to provide for an additional alternate to assume the overall fulltime onsite responsibility for the safe operation of CNS,



should the Division Manager of Nuclear Operations (DMNO) be unavailable. The change would allow the Senior Manager of Staff Support to assume the above identified responsibility in the absence of the DMNO, provided the Senior Manager of Operations and the Senior Manager of Technical Support Services are also unavailable. The proposed change reflects an addition of the position, Senior Manager of Staff Support, to the CNS organizational structure.

### III. SIGNIFICANT HAZARDS DETERMINATION

10 CFR 50.91(a)(1) requires that licensee requests for operating licensee 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.

This submittal is judged to consist of three changes:

1. An administrative change to Figure 2.1.1, Page 10, Reactor Water Level Indication Correlation.
2. Correction of an apparent conflicting statement in Paragraph 4.7.C, BASES.
3. An administrative change to Paragraph 6.1.1, ADMINISTRATIVE CONTROLS/ORGANIZATION/Responsibility.

The evaluation of these three revisions follows:

#### 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:

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

#### Evaluation

1. The first proposed change revises Page 10 of the CNS Technical Specifications, Figure 2.1.1, Reactor Water Level Indication Correlation, to present both existing and new information in an easier to understand format. This proposed change is administrative in nature and does not make any changes in numerical vessel level setpoint values. The level setpoint values and their associated instrumentation given on Page 10 (Figure 2.1.1) are delineated and controlled elsewhere in the CNS Technical Specifications. Some changes have been made to the equipment identification nomenclature, but these are strictly editorial in nature and do not affect the number of instruments or their function. Therefore, this change reflects only a change in the format, and content of presented

information and does not involve an increase in the probability or consequences of an accident previously evaluated.

2. The second proposed change revises Paragraph 4.7.C, BASES, of the CNS Technical Specifications. This change deletes a statement concerning the performance of tests to demonstrate secondary containment integrity prior to the time primary containment is opened for refueling. This statement conflicts with Surveillance Requirement 4.7.C.1.c which requires the subject tests to be performed at each refueling outage prior to refueling.

The Limiting Conditions for Operations (LCO) and Surveillance Requirements (Section 3.7/4.7) are unaffected by this change. No change to plant hardware or plant operations results from this change. This change only corrects a potential source of confusion in the CNS Technical Specifications. Therefore, this change does not involve an increase in the probability or consequences of an accident previously evaluated.

3. The third proposed change involves the revision of Paragraph 6.1.1 of the CNS Technical Specifications to add the Senior Manager of Staff Support as being an additional alternate responsible for the safe operation of CNS if the Division Manager of Nuclear Operations is unavailable. This paragraph, as proposed, does not change the hierarchy of automatically shifting the above referenced responsibility to the Senior Manager of Operations or the Senior Manager of Technical Support Services. This change reflects the addition of the Senior Manager of Staff Support to the CNS Organization, and is consistent with the requirements of ANSI N18.1-1971. Therefore, this change does not involve an increase in the probability or consequences of an accident previously evaluated.

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

#### Evaluation

1. The first proposed change involves the replacement of Figure 2.1.1, Page 10, Technical Specification with an updated presentation of existing and additional information. This change does not make any changes in specification requirements. Some changes have been made to the equipment identification nomenclature, but these are strictly editorial in nature and do not affect the number of instruments or their function. These changes are administrative in nature and do not constitute any hardware changes, additions, or changes in plant configuration.

The proposed change to Figure 2.1.1 introduces some new information, including three new level indication illustrations, not shown on the current Figure 2.1.1. This information is controlled by other portions of the Technical Specifications and does not represent any changes or additions of hardware, or changes in plant configuration. The Proposed Figure 2.1.1 is more user friendly through improved presentation of level indication information. Therefore, this proposed change does not create the possibility for a new or different kind of accident previously evaluated.

2. The second proposed change deletes a statement from Paragraph 4.7.C, BASES, involving the performance of tests to demonstrate secondary containment integrity prior to opening of the primary containment. This change is proposed in order to correct an apparent conflict between the above referenced statement and Surveillance Requirement 4.7.C.1.c. This change involves no hardware changes and does not effect operations (including refueling) in any way. Therefore, this proposed change does not create the possibility for a new or different kind of accident previously evaluated.
3. The third proposed change involves the revision of Paragraph 6.1.1 of the CNS Technical Specifications to include the Senior Manager of Staff Support as an additional alternate for assuming overall onsite fulltime responsibility for the safe operation of CNS in the absence of the DMNO. This change is administrative in nature and does not result in any hardware changes or changes in plant operations. Therefore, this proposed change does not create the possibility for a new or different kind of accident previously evaluated.

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

#### Evaluation

1. The first proposed change addresses the replacement of the existing Figure 2.1.1 of Technical Specifications with a reformatted and updated Figure 2.1.1. Information displayed in this proposed change is contained and controlled by other portions of the CNS Technical Specifications and/or other controlled CNS documents. There have been no changes in plant parameters or safety setpoint settings associated with this proposed change. Therefore, this change makes no physical impact on the margin of safety.

As for the effect on human factors, the above referenced proposed change presents reactor vessel level information in a format which is both easier to understand, and more accurately reflects level transmitter and level indication identification nomenclature numbers. The improvement in the manner that information is presented in this figure is an



enhancement to the Technical Specification clarity. Therefore, implementation of this proposed change could not create a significant reduction in margin of safety.

2. The second proposed change involves the deletion of a conflicting statement from Paragraph 4.7.C, BASES, Technical Specifications. This statement addresses the performance of tests to demonstrate secondary containment integrity prior to the opening of primary containment. CNS Technical Specifications 3.7.C.1 (a through e) and 4.7.C.1.c establish the LCO and Surveillance Requirements necessary to provide assurance that secondary containment integrity is maintained. From these applicability requirements it follows that surveillance tests need not be performed until conditions exist that could result in damage to irradiated fuel. The above referenced current statement contained in Paragraph 4.7.C, BASES, is artificially conservative in that none of the conditions of LCO 3.7.C.1 are applicable prior to the opening of primary containment. Therefore, deletion of this artificially conservative statement from the BASES would not create a significant reduction in margin of safety.
3. The final proposed change adds the Senior Manager of Staff Support to Paragraph 6.1.1 of the CNS Technical Specifications. This change is administrative in nature, and reflects the addition of a new management position into the CNS organization. Therefore, this proposed change does not create a significant reduction in 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, the reasons detailed above, the District requests the NRC approval of this Proposed Change 95.