



Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68602-0499
TELEPHONE (402) 564-8561
FAX (402) 563-5551

G. R. HORN
Vice-President, Nuclear
(402) 563-5518

NLS960038
March 5, 1996

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

Subject: Revision to Proposed Change No. 142 to Technical Specifications
Diesel Generator Enhancements
Cooper Nuclear Station, NRC Docket No. 50-298, DPR-46

- References: 1. Letter from G. R. Horn to NRC dated May 5, 1995, "Proposed Change No. 142 to the CNS Technical Specifications, Diesel Generator Enhancements"
2. Letter from G. R. Horn to NRC dated July 14, 1995, "Revision to Proposed Change No. 142 to Technical Specifications, Diesel Generator Enhancements"

The Nebraska Public Power District (District) requests that Proposed Change No. 142 to the Cooper Nuclear Station (CNS) Technical Specifications, "Diesel Generator Enhancements," be revised as described below and detailed in Attachment 1. These revisions result from discussions held with the NRC Staff on the subject proposed change, and involve only changes to the bases section for the requested changes. Therefore, the previous significant hazards evaluation and its conclusions remain valid.

On November 1, 1995, the District participated in a teleconference with the NRC Staff to respond to questions concerning the proposed change. As a result of those discussions, the District agreed to revise portions of the proposed bases sections to provide improved clarity. The originally proposed language was consistent with that published in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4 (STS). However, the NRC Staff raised concerns regarding the possible interpretation of three specific areas.

1. Bases Section 3.5 included the following statement: "Immediate shutdown could cause grid instability, which could result in a total loss of AC power." The NRC Staff raised the concern that this language could be construed as being in conflict with the General Design Criterion 17. The District's interpretation of this language, adopted from the STS, is that an immediate shutdown would create a greater risk for initiation of a grid stability event when compared with a controlled shutdown over a 12 hour period. However, to prevent any misinterpretation of those bases, the District agreed to remove the statement.
2. Bases Section 4.5 included the following statement: "According to Generic Letter 84-15, 24 hours is a reasonable time to confirm that the OPERABLE diesel generator is not affected by the same problem as the inoperable diesel generator." While Generic Letter 84-15 implies this position, it does not explicitly state "...24 hours is a reasonable time..." Therefore, this statement has been deleted.

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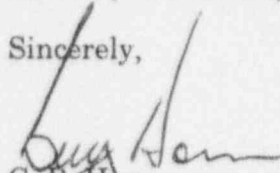
3. Confusion existed in Bases Section 4.9 concerning the discussion of the requirements in Surveillance Requirement 4.9.A.2.a.2 (six-month surveillance test) to log the time required to reach rated voltage and frequency. The intent of this discussion was to indicate that the starting time requirements would apply during the six-month fast start, but would not apply during a modified ("slow") start. Following further discussions, the District agreed to delete the last two paragraphs of the proposed Bases Section 4.9 on page 200.

Provided in Attachment 1 are the marked-up pages showing the above described revisions to the previously proposed changes. A compilation of the proposed changes (as originally submitted in Reference 1 and subsequently revised by Reference 2 and again by this letter) are provided in Attachment 2. This revision to Proposed Change No. 142 does not result in a change to the significant hazards evaluation submitted in Reference 1, nor its conclusions.

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

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

Sincerely,



G. E. Horn
Vice-President, Nuclear

GRH/MJB
Attachments

cc: Regional Administrator
USNRC - Region IV

Senior Resident Inspector
USNRC - Cooper Nuclear Station

Senior Project Manager
USNRC - NRR Project Directorate IV-1

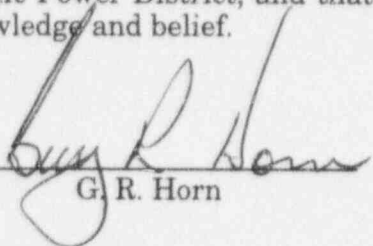
Director, Department of Health
State of Nebraska

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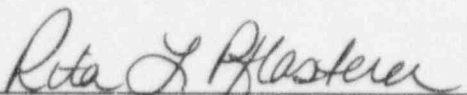
G. R. Horn, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this correspondence on behalf of Nebraska Public Power District; 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

5th day of March, 1996.



NOTARY PUBLIC

