



Nebraska Public Power District

GENERAL OFFICE
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NLS8500075

April 26, 1985

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

Dear Mr. Vassallo:

Subject: Proposed Change No. 18 to Technical Specifications
Cooper Nuclear Station; Miscellaneous
NRC Docket No. 50-298, DPR-46

In accordance with the applicable provisions specified in 10CFR50, Nebraska Public Power District requests that Technical Specifications for Cooper Nuclear Station (CNS) be revised to incorporate the miscellaneous changes listed below:

<u>Attachment</u>	<u>Subject</u>
1	SGT and Control Room Ventilation Systems
2	Clarification of Low-Low Set Design Change
3	Refueling Interlocks Clarification
4	Environmental Qualification Program
5	Standby Liquid Control System RCIC Test and Calibration Frequencies Table Typographical Errors
6	Editorial Changes to Table of Contents and Section 6

A discussion and the applicable revised Technical Specification pages are contained in each attachment. Each modification to the Technical Specifications within this proposed change has been evaluated with respect to the requirements of 10CFR50.92. The results of individual evaluations are included within each attachment.

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

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Mr. Domenic B. Vassallo

Page 2

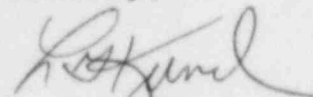
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This proposed change incorporates all amendments to the CNS Facility Operating License through Amendment 90 issued January 3, 1985.

This change has been reviewed by the necessary Safety Review Committees and payment of \$150 is submitted in accordance with 10CFR170.12.

In addition to three signed originals, 40 copies are also submitted for your use. Should you have any questions or require additional information, please contact me.

Sincerely,



L. G. Kuncel

Assistant General Manager - Nuclear

LGK/lrb:emz26/5

Attachment

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

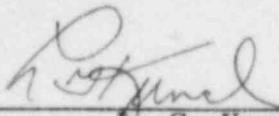
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STATE OF NEBRASKA)

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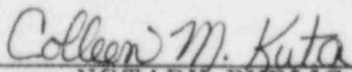
PLATTE COUNTY)

L. G. Kuncel, 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. Kuncel

Subscribed in my presence and sworn to before me this 26th day of
April, 1985.



NOTARY PUBLIC



Revised Technical Specifications for
Standby Gas Treatment (SGT) and Control Room Ventilation Systems

Revised Pages: 165
182
183
215
215d

A recent IE Inspection Report (84-20) noted that CNS Technical Specification requirements for determining the operability of the SGT system/subsystems did not state the absolute value of system design flow rate, and did not explicitly define the SGT system design function by specifying the minimum secondary containment vacuum to be maintained by the SGT system during in-place cold DOP and halogenated hydrocarbon leak tests. An engineering review was conducted by the District to correct ambiguities in the Technical Specifications for the SGT system in these areas. Due to system similarities, a comparable review of the Technical Specification requirements for the Control Room Ventilation System was also conducted. It was observed that system flow rates for this system were also not specified.

Nebraska Public Power District requests a revision to the Cooper Nuclear Station Technical Specifications which provides the system flow rates and operating conditions pertinent to testing of the HEPA filters and charcoal adsorbers and deletes ambiguities in the bases for the SGT and Control Room Ventilation systems. This greater specificity should provide for improved assurance of verification that these systems function as designed, hence there is no loss of safety function or any reduction in the degree of protection provided public health and safety.

Evaluation of this Revision with Respect to 10CFR50.92

- A. The enclosed Technical Specification change is judged to involve no significant hazards based upon the following:
1. Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Evaluation:

The proposed change does not change existing equipment, surveillances, or procedures. The change provides a more consistent and sound technical basis for determining system operability by specifying the absolute values for flow rates through the filters for the SGT and Control Room Ventilation systems and the Reactor Building pressure for the in-place leak tests pertinent to the SGT system. The flow rate specified for the SGT system corresponds to the design flow rate provided in the USAR (1,780 CFM). This corresponds to filterface velocity of 42 FPM by engineering calculation. The flow rate specified for the Control Room Ventilation system corresponds to the achieved preoperational test value (341 CFM) which meets and exceeds the design objective that the fan for this system be sized to handle 225 CFM at two inches of

water gage static pressure as provided for in the USAR. 341 CFM corresponds to filterface velocity of 22 FPM by engineering calculation. It is the District's assessment that these changes do not affect the probability or consequences 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:

The proposed change does not introduce any new mode of operation, but specifies more detailed Limiting Conditions for Operation which should provide for improved assurance of meeting the design objectives given in the USAR. 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 the margin of safety?

Evaluation:

The proposed change does not modify existing facility equipment, surveillances, or procedures, but provides a more consistent and sound technical basis for determining system operability. In this sense, the increased specificity of the proposed Technical Specifications makes them more stringent and should result in an improvement in the margin of safety.

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

The Commission has provided guidance concerning the application of the standards for making a no significant hazards consideration determination by providing certain examples (48CFR14870). The examples include: "(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications . . ." It is the District's belief that the proposed change is encompassed by the above example.