

December 1, 1992

(129) Docket No. 50-298

Mr. Guy R. Horn
Nuclear Power Group Manager
Nebraska Public Power District
Post Office Box 499
Columbus, Nebraska 68602-0499

Dear Mr. Horn:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) RELATED TO PROPOSED CHANGE NO. 100 TO THE COOPER NUCLEAR STATION TECHNICAL SPECIFICATIONS, ELIMINATION OF MAIN STEAM LINE RADIATION MONITOR SCRAM AND ISOLATION FUNCTIONS (TAC NO. M83768)

By letter dated May 4, 1992, you requested that the NRC staff amend the Technical Specifications (TS) for Cooper Nuclear Station (CNS) to permit removal of the Main Steam Line Radiation Monitor (MSLRM) reactor scram and containment isolation functions. The NRC staff has examined your request and finds that additional information is needed to complete our review. The specific additional information is defined in the enclosure.

We request that you expedite your response to this request to permit the staff evaluation to be complete in time for you to implement the proposed changes during the next CNS refueling outage. If you have any questions regarding this issue, please contact me. This requirement affects fewer than ten respondents and therefore is not subject to Office of Management's Budget review under P.L. 96-511.

Sincerely,

ORIGINAL SIGNED BY:

Harry Rood, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
RAI

cc w/enclosure:
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Nuclear Power Group Manager
Nebraska Public Power District
Post Office Box 499
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Sincerely,

A handwritten signature in cursive script that reads "Harry Rood".

Harry Rood, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
RAI

cc w/enclosure:
See next page

Mr. Guy R. Horn
Nuclear Power Group Manager

Cooper Nuclear Station

cc:

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REQUEST FOR ADDITIONAL INFORMATION

ELIMINATION OF MAIN STEAM LINE RADIATION MONITOR SCRAM/ISOLATION FUNCTIONS

COOPER NUCLEAR STATION (CNS)

DOCKET NO. 50-298

Your request (Proposed Change No. 100) for Technical Specification (TS) changes relies on the NRC Staff's Safety Evaluation (SE) of the General Electric Topical Report, NEDO-31400. The SE approved removal of the Main Steam Line Radiation Monitor (MSLRM) reactor scram and containment isolation functions, subject to three conditions being met by each licensee desiring to make the change. Additional information is needed by the staff to make the determination that the three conditions have been or will be met at CNS.

1. The staff SE requires that "The applicant demonstrates that the assumptions with regard to input values (including power per assembly, C_i/Q_i , and decay times) that are made in the generic analysis bound those for the plant." Your response to this is the statement that "The District has also evaluated the CRDA [Control Rod Drop Accident] analysis for CNS and concludes that the assumptions used in NEDO-31400 bound those used in the CNS CRDA accident analysis."

This statement asserts, but does not demonstrate, that the CNS assumptions are bounded by the generic analysis. To permit the staff to evaluate your compliance with this requirement, we request that you demonstrate that the CNS input values are bounded by the NEDO-31400 values by providing a list of the input values used in the analysis of CNS and those used in the NEDO-31400 analysis, and a discussion of any values for which the CNS value is not bounded by the NEDO-31400 analysis.

2. The staff SE requires that "The applicant includes sufficient evidence (implemented or proposed operating procedures, or equivalent commitments) to provide reasonable assurance that increased significant levels of radioactivity in the main steam lines will be controlled expeditiously to limit both occupational doses and environmental releases." Your response is the statement that "The District commits to revise its procedures as necessary to ensure that adequate controls exist to provide prompt control of significant increases in Main Steam Line activity..."

In order to determine whether or not this requirement will be met at CNS, we request that you provide a discussion of any procedure changes that you plan to make in response to this requirement, and how the revised (or existing, if no changes are planned) procedures ensure that significant increases in Main Steam Line activity will be promptly controlled in the absence of automatic containment isolation on high MSLRM signal. Also, we request that you provide an evaluation of the time that it takes to isolate and the occupational doses and environmental releases with and without automatic isolation on a MSLRM signal so that we may review this aspect of the proposed change.

3. The staff SE requires that the MSLRM and the offgas radiation monitor alarm setpoint be standardized at 1.5 times the nominal full-power nitrogen-16 background dose rate at the monitor locations, and that the applicant commits to promptly sample the reactor coolant to determine possible contamination levels in the plant reactor coolant if the MSLRM or offgas radiation monitors exceed their alarm setpoints. Your response to this requirement states that the MSLRM alarm setpoint will be retained at 1.5 times the nominal background, and commits to promptly sample the reactor coolant if this setpoint is exceeded. However, you make no mention of the offgas radiation monitor. We request that you explain how this aspect of requirement 3 is met at CNS.