



## Nebraska Public Power District

GENERAL OFFICE  
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NLS8500138  
June 14, 1985

59-298

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

Dear Mr. Vassallo:

Subject: Revision to Proposed Change 18 - Reactor Water  
Sample Valves Isolation Set Point Change

- Reference: 1) Letter from J. M. Pilant to D. B. Vassallo dated  
December 17, 1982, "Safety Relief Valve Low-Low  
Set System and Lower MSIV Water Level Trip for  
Cooper Nuclear Station"
- 2) Letter from J. M. Pilant to D. B. Vassallo dated  
February 15, 1983, same subject as Reference 1
- 3) Letter from L. G. Kuncel to D. B. Vassallo dated  
April 26, 1985, "Proposed Change No. 18 to  
Technical Specifications Cooper Nuclear Station;  
Miscellaneous"

As part of the resolution of the Mark I Containment Long-Term Program, the District installed a Low-Low Set Relief Valve Logic and Lower Main Steam Isolation (MSIV) water level trip at Cooper Nuclear Station (CNS). Reference 1 submitted Technical Specifications and design information for the change and additional information was sent in Reference 2. As part of the change, the low water level trip set point for the automatic isolation of the Reactor Water Sample Valves (RWSV) was changed from Level 2 ( $>-37$  inches) to Level 1 ( $>-145.5$  inches). This was inadvertently omitted in the proposed Technical Specification change submitted in Reference 1, although it was discussed and analyzed by General Electric in NEDE-22197 submitted in Reference 2. Subsequently, no mention was made of this set point change in the Safety Evaluation issued for the Low-Low Set Relief Valve Logic and Lower MSIV water level trip with Amendment 83 to the CNS Operating License.

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Proposed changes to Technical Specifications were submitted in Reference 3 to correct the water level set point that initiates isolation of the Reactor Water Sample Valves. This letter is written to provide the no significant hazards consideration for the lowering of the water level isolation set point from Level 2 to Level 1 for the Reactor Water Sample Valves based on the following:

1. Does the modification involve a significant increase in the probability or consequences of an accident previously identified?

Evaluation

The accident of concern is radiation release through the Reactor Water Sample line for a break in the line outside of primary containment. The water level trip for the MSIV's was lowered from Level 2 ( $>-37$  inches) to Level 1 ( $>-145.5$  inches) in addition to that of the Reactor Water Sample Valves. NEDE-22223, submitted with Reference 1, showed that lowering the water level trip for the MSIV's will not increase the amount of radiation releases for design bases accidents. The RWSU's isolate on two signals which are from the same instruments for the MSIV's; i.e., low reactor water level and high main steam line radiation. The RWSV's are 3/4-inch valves which represent approximately 0.04 percent of the flow area for the Main Steam Lines. The amount of inventory loss through this line for a break in the line outside the containment would be insignificant and will not affect the calculated radiation doses. The modification does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the modification create the possibility for a new or different kind of accident from any accident previously evaluated?

Evaluation

As shown above, the modification lowers the water level trip for the RWSV's and does not affect the calculated radiation doses from a break in the line outside of containment. Previous accident analyses remain bounding with no creation of a new or different kind of accident.

3. Does the modification involve a significant reduction in a margin of safety?

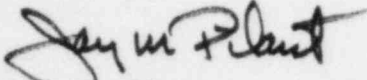
Evaluation

Calculated radiation doses resulting from a break of the line outside of containment are not affected by the modification.

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The reactor coolant inventory loss because of the lowered water level trip is insignificant when compared with that of a main steam line break outside of containment which has been previously evaluated and approved.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jay M. Pilant". The signature is fluid and cursive, with the first name "Jay" being the most prominent.

Jay M. Pilant  
Technical Staff Manager  
Nuclear Power Group

JMP/grs:emz14/10