

Nebraska Public Power District

GENERAL OFFICE
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NLS8500260

September 20, 1985

Director, Nuclear Reactor Regulation
Attention: Domenic B. Vassallo, Chief
Operating Reactor Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Expedited Technical Specification Change -
Single Loop Operation
Cooper Nuclear Station
Docket No. 50-298

Dear Mr. Vassallo:

Based upon discussions with our NRC Project Manager, this letter is written to request an expeditious change to the Cooper Nuclear Station Technical Specifications to allow operation with one recirculation loop out of service greater than twenty-four (24) hours.

Cooper Nuclear Station Technical Specification 3.6.F.3 states that "The reactor shall not be operated for a period in excess of 24 hours with one recirculation loop out of service." Upon start-up from the recent extended outage, one recirculation pump MG set developed a low insulation reading to ground in the rotor windings. Recirculation Pump B was tripped at 0900 CDT, Friday, September 20, 1985. Attached are proposed Technical Specification pages which would allow single loop operation for an indefinite period of time. The required no significant hazards determination is also attached.

It is anticipated that two weeks will be required to make the MG set operable again. A license amendment approving the attached Technical Specifications on a permanent basis is requested. These Technical Specifications have been patterned after recently approved Duane Arnold Technical Specifications, and considering the results of discussions between the NRC staff and the BWR Owner's Group. It should be noted that the applicable provisions of General Electric SIL 380 have been implemented at Cooper Nuclear Station prior to start-up from the recent outage.

The primary reason this expedited Technical Specification change is requested is that without the extended operating time, Cooper Nuclear Station would be out of service for approximately two weeks with a considerable impact on the District. Cooper Nuclear Station is presently in a start-up testing program following our recent extended outage, and much testing remains throughout the upcoming two-week period. Additionally, if plant shutdown were required, the shutdown cycle on the plant would have a negative impact on safety systems and plant conditions already achieved.

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Under present Technical Specifications, the reactor must be tripped prior to 0917, Saturday, September 21, 1985. The plant will commence a backdown in power approximately 0400, September 21, 1985. NRC approval prior to 0400 will be most beneficial.

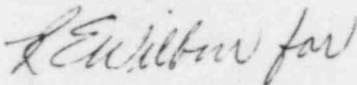
Mr. H. R. Borchert, Nebraska Department of Health, has been notified by telephone of the circumstances at Cooper Nuclear Station, and is being copied on this letter.

This change has been reviewed by the necessary Safety Review Committees and payment of \$150 is submitted in accordance with 10 CFR 170.12. In addition to three (3) signed originals, forty (40) copies are also submitted for your use.

This proposed license amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR, Part 20, and changes in surveillance requirements. The District has determined that this amendment involves no significant increase in the amounts, and no significant change in the type, of any effluents that may be released off site, and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, the District is of the opinion that this amendment would meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with this amendment.

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

Sincerely,



L. G. Kuncel

Assistant General Manager - Nuclear

LGK/jdw:rs20/3

Attachments

cc: H. R. Borchert
Nebraska Department of Health

J. M. Taylor, Director
NRC Office of Instruction & Enforcement

Director, U.S. NRC, Region IV

CNS Senior Resident Inspector

Mr. Domenic B. Vassallo, Chief

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STATE OF NEBRASKA)

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PLATTE COUNTY)

R. E. Wilbur, 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.

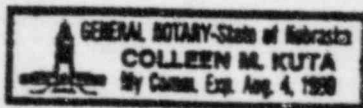
R. E. Wilbur

R. E. Wilbur

Subscribed in my presence and sworn to before me this 20th day of September, 1985.

Colleen M. Kuta

NOTARY PUBLIC



Evaluation of this Revision with Respect to 10CFR50.92

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:

Present CNS Technical Specifications allow operation with one recirculation pump out of service for up to 24 hours without revising MAPLHGR limits, MCPWR limits, flow-biased scram and rod block setpoints. The proposed amendment would place additional restrictions and limitations on single loop operation.

The proposed more restrictive Technical Specification changes relating to MCPWR limits, flow-biased scram and rod block setpoints, and reduced MAPLHGR operating limits, ensure that the probabilities and the consequences of accidents with single recirculation loop operation will not be significantly increased. The proposed changes would alleviate the concerns related to the thermal-hydraulic instability by adding surveillance requirements for detecting thermal-hydraulic instabilities and specifying the remedial operator actions for responding to them. Such operator actions will assure that there will be no significant increase in the probability or consequences of an accident.

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

Evaluation:

Operation with one recirculation loop is not expected to create the possibility of a new or different kind of accident from any previously analyzed, as all abnormal operating transients which could be initiated with single loop operation, such as an inadvertent startup of an idle recirculation pump or pump trip have been analyzed in NEDO 24258 and the FSAR.

For single and dual loop operation, the addition of the surveillance requirements and remedial actions for thermal-hydraulic instability detection and response involve normal plant operating practices and, therefore, are not expected to create a new or different kind of accident from any previously analyzed in the FSAR.

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

Evaluation:

Proposed are revised operating limits, setpoints, and procedures for the proposed single and dual loop operation. The proposed changes will ensure that the FSAR margins of safety will not be reduced during normal operation and with one recirculation pump not operating. These

conclusions are based on the evaluations by GE in support of the CNS single loop operation presented in the GE report NEDO 24258.

For single and dual loop operation, the additional surveillance requirements and remedial actions required of the operator for detection of a response to thermal-hydraulic instability will increase the present margin of safety.