

5. The Rod Block Monitor (RBM) is designed to automatically prevent fuel damage in the event of erroneous rod withdrawal from locations of high power density during high power level operation. Two channels are provided, and one of these may be bypassed from the console for maintenance and/or testing. Tripping of one of the channels will block erroneous rod withdrawal soon enough to prevent fuel damage. This system backs up the operator who withdraws control rods according to written sequences. The specified restrictions with one channel out of service conservatively assure that fuel damage will not occur due to rod withdrawal errors when this condition exists.

A limiting control rod pattern is a pattern which results in the core being on a thermal hydraulic limit (i.e., MCPR equals the operating limit as defined on Figure 3.11, and LHGR = as defined in 1.0.A.4). During use of such patterns, it is judged that testing of the RBM system prior to withdrawal of such rods to assure its operability will assure that improper withdrawal does not occur. It is the responsibility of the Reactor Engineer to identify these limiting patterns and the designated rods either when the patterns are initially established or as they develop due to the occurrence of inoperable control rods in other than limiting patterns. Other personnel qualified to perform this function may be designated by the station superintendent.

#### C. Scram Insertion Times

The control rod system is designed to bring the reactor subcritical at a rate fast enough to prevent fuel damage; i.e., to prevent the MCPR from becoming less than the safety limit. The limiting power transient is defined in Reference 3. Analysis of this transient shows that the negative reactivity rates resulting from the scram provide the required protection, and MCPR remains greater than the safety limit.

The surveillance requirement for scram testing of all the control rods after each refueling outage and 10% of the control rods at 16-week intervals is adequate for determining the operability of the control rod system yet is not so frequent as to cause excessive wear on the control rod system components.

The numerical values assigned to the predicted scram performance are based on the analysis of data from other BWR's with control rod drives the same as those on Cooper Nuclear Station.

The occurrence of scram times within the limits, but significantly longer than the average, should be viewed as an indication of a systematic problem with control rod drives.

In the analytical treatment of the transients which are assumed to scram on high neutron flux, 290 milliseconds are allowed between a neutron sensor reaching the scram point and start of motion of the control rods. This is adequate and conservative when compared to the typical time delay of about 210 milliseconds estimated from scram test results. Approximately the first 90 milliseconds of each of these time intervals result from the sensor and circuit delays; at this point, the pilot scram solenoid deenergizes. Approximately 120 milliseconds later,

Revised Technical Specifications for  
Section 6 Administrative Controls  
Editorial Changes

Revised Pages: 220, 221, 222, 224, 225, 231, 236, 237

The District recently added two new management positions to its organization. These positions have been identified as the Maintenance Manager and the Outage & Modifications Manager. The Maintenance Manager will be in charge of the Maintenance Group (Electrical, Mechanical, Maintenance Scheduling). The Operations Manager used to fulfill these functions but his maintenance duties have been delegated to allow him more time in operations management. The Outage & Modifications Manager will be responsible for outage-related and design modification activities. The attached change shows the revision to the Organization Chart as a result of these new positions, and the Maintenance Managers addition to SORC. Additionally, the General Manager, Assistant General Manager - Nuclear, and Reactor Engineer Supervisor have had their titles changed to President, Vice President - Nuclear, and Operations Engineering Supervisor respectively. These changes are changes in title only and do not alter these individuals duties, or responsibilities, or cause a change in CNS's present organizational structure.

Evaluation of this Revision with Respect to 10CFR50.92

A. The enclosed Technical Specification change is judged to involve no significant hazards based on 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 operating procedures. It is the District's opinion based on this fact, that this change does not affect the probability or consequences of an accident previously evaluated.

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

Evaluation:

The proposed change does not alter our present modes of operation or create a new mode of operation. 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 a margin of safety?

Evaluation:

This proposed license amendment does change the District's administrative procedures by adding the Maintenance, Outage and

Modifications Managers positions. By dividing the previous responsibilities of the Operations Manager, the District feels that both maintenance and operations can benefit from the increased attention. Also, the addition of an Outage & Modifications Manager will enhance the activities that take place in this area. The changes that occur in title only will not affect this evaluation. For these reasons it is felt that this increased attention in the operations and maintenance (outage) areas will result in an improvement in the margin of safety.

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

The commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists 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.

- 6.2.1 The organization and duties of committees for the review and audit of station operation shall be as outlined below:

A. Station Operations Review Committee (SORC)

1. Membership:

- a. Chairman: Division Manager of Nuclear Operations
- b. Technical Staff Manager
- c. Operations Manager
- d. Technical Manager
- e. Operations Supervisor
- f. Maintenance Supervisor
- g. Instrument and Control Supervisor
- h. Chemistry and Health Physics Supervisor
- i. Plant Engineering Supervisor
- j. Operations Engineering Supervisor
- k. Computer Applications Supervisor
- l. Maintenance Manager
- m. Quality Assurance Manager - non-voting member.

Alternate members shall be appointed in writing by the Division Manager of Nuclear Operations to serve on a temporary basis; however, no more than two alternates shall serve on the Committee at any one time.

- 2. Meeting Frequency: Monthly, and as required on call of the Chairman.
- 3. Quorum: Division Manager of Nuclear Operations or his designated alternate plus four other members including alternates.
- 4. Responsibilities:
  - a. Review all proposed normal, abnormal, maintenance and emergency operating procedures specified in 6.3.1, 6.3.2, 6.3.3, and 6.3.4 and proposed changes thereto: and any other proposed procedures or changes thereto determined by any member to effect nuclear safety.
  - b. Review all proposed tests and experiments and their results, which involve nuclear hazards not previously reviewed for conformance with technical specifications. Submit tests which may constitute an unreviewed safety question to the NPPD Safety Review and Audit Board for review.
  - c. Review proposed changes to Technical Specifications.
  - d. Review proposed changes or modifications to station systems or equipment as discussed in the SAR or which involves an unreviewed safety question as defined in 10CFR50.59(c). Submit changes to equipment or systems having safety significance to the NPPD Safety Review and Audit Board for review.
  - e. Review station operation to detect potential nuclear safety hazards.

6.2 (cont'd)

- f. Investigate all violations of Technical Specifications, including reporting evaluation and recommendations to prevent recurrence, to the Vice President - Nuclear and to the Chairman of the NPPD Safety Review and Audit Board.
- g. Perform special reviews and investigations and render reports thereon as requested by the Chairman of the Safety Review and Audit Board.
- h. Review all reportable events specified in Section 50.73 to 10CFR Part 50.
- i. Review drills on emergency procedures (including plant evacuation) and adequacy of communication with off site groups.
- j. Periodically review procedures required by Specifications 6.3.1, 6.3.2, 6.3.3, and 6.3.4 as set forth in administrative procedures.

5. Authority

- a. The Station Operations Review Committee shall be advisory.
- b. The Station Operations Review Committee shall recommend to the Division Manager of Nuclear Operations approval or disapproval of proposals under items 4, a through e and j above. In case of disagreement between the recommendations of the Station Operations Review Committee and the Division Manager of Nuclear Operations, the course determined by the Division Manager of Nuclear Operations to be the more conservative will be followed. A written summary of the disagreement will be sent to the Vice President - Nuclear and to the NPPD Safety Review and Audit Board.
- c. The Station Operations Review Committee shall report to the Chairman of the NPPD Safety Review and Audit Board on all reviews and investigations conducted under items 4.f, 4.g, 4.h, and 4.i.
- d. The Station Operations Review Committee shall make determinations regarding whether or not proposals considered by the Committee involve unreviewed safety questions. This determination shall be subject to review by the NPPD Safety Review and Audit Board.

6. Records:

Minutes shall be kept for all meetings of the Station Operations Review Committee and shall include identification of all documen-

tary material reviewed; copies of the minutes shall be forwarded to the Chairman of the NPPD Safety Review and Audit Board and the Vice President - Nuclear within one month.

7. Procedures:

Written administrative procedures for Committee operation shall be prepared and maintained describing the method for submission and content of presentations to the committee, provisions for use of subcommittees, review and approval by members of written Committee evaluations and recommendations, dissemination of minutes, and such other matters as may be appropriate.

B. NPPD Safety Review and Audit Board (SRAB)

Function: The Board shall function to provide independent review and audit of designated activities.

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
  - d. Proposed changes to Appendix A Technical Specifications or the CNS Operating License.
  - e. Violations of applicable codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
  - f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
  - g. All reportable events specified in Section 50.73 to 10CFR Part 50.
  - h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
  - i. Minutes of meetings of the Station Operations Review Committee.
  - j. Disagreement between the recommendations of the Station Operations Review Committee and the Division Manager of Nuclear Operations.
  - k. Review of events covered under e,f,g, and h above include reporting to appropriate members of management on the results of investigations and recommendations to prevent or reduce the probability of recurrence.
5. Authority: The NPPD Safety Review and Audit Board shall report to and be advisory to the Vice President - Nuclear on those areas of responsibility specified in Specifications 6.2.1.B.4 and 6.2.1.B.7.



6. Records:

Minutes shall be recorded for all meetings of the NPPD Safety Review and Audit Board and shall identify all documentary material reviewed. Copies of the minutes shall be forwarded to the Vice President - Nuclear and the Division Manager of Nuclear Operations, and such others as the Chairman may designate within one month of the meeting.

7. Audits:

Audits of selected aspects of plant operation shall be performed under the cognizance of SRAB with a frequency commensurate with their safety significance. Audits performed by the Quality Assurance Department which meet this specification shall be considered to meet the SRAB audit requirements if the audit results are reviewed by SRAB. A representative portion of procedures and records of the activities performed during the audit period shall be audited and, in addition, observations of performance of operating and maintenance activities shall be included. These audits shall encompass:



1. A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, <sup>1/</sup> e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
2. A summary description of facility changes, tests or experiments in accordance with the requirements of 10CFR50.59(b).
3. Pursuant to 3.8.A, a report of radioactive source leak testing. This report is required only if the tests reveal the presence of 0.005 microcuries or more of removable contamination.
4. Documentation of all challenges to relief valves or safety valves.

D. Monthly Operating Report

Routine reports of operating statistics, shutdown experience, and a narrative summary of operating experience relating to safe operation of the facility, shall be submitted on a monthly basis to the individual designated in the current revision of Reg. Guide 10.1 no later than the tenth of each month following the calendar month covered by the report.

6.5.2 Reportable Events

A Reportable Event shall be any of those conditions specified in Section 50.73 to 10CFR Part 50. The NRC shall be notified and a report submitted pursuant to the requirements of Section 50.73. Each Reportable Event shall be reviewed by SORC and the results of this review shall be submitted to SRAB and the Vice President - Nuclear.

1/ This tabulation supplements the requirements of §20.407 of 10CFR Part 20.

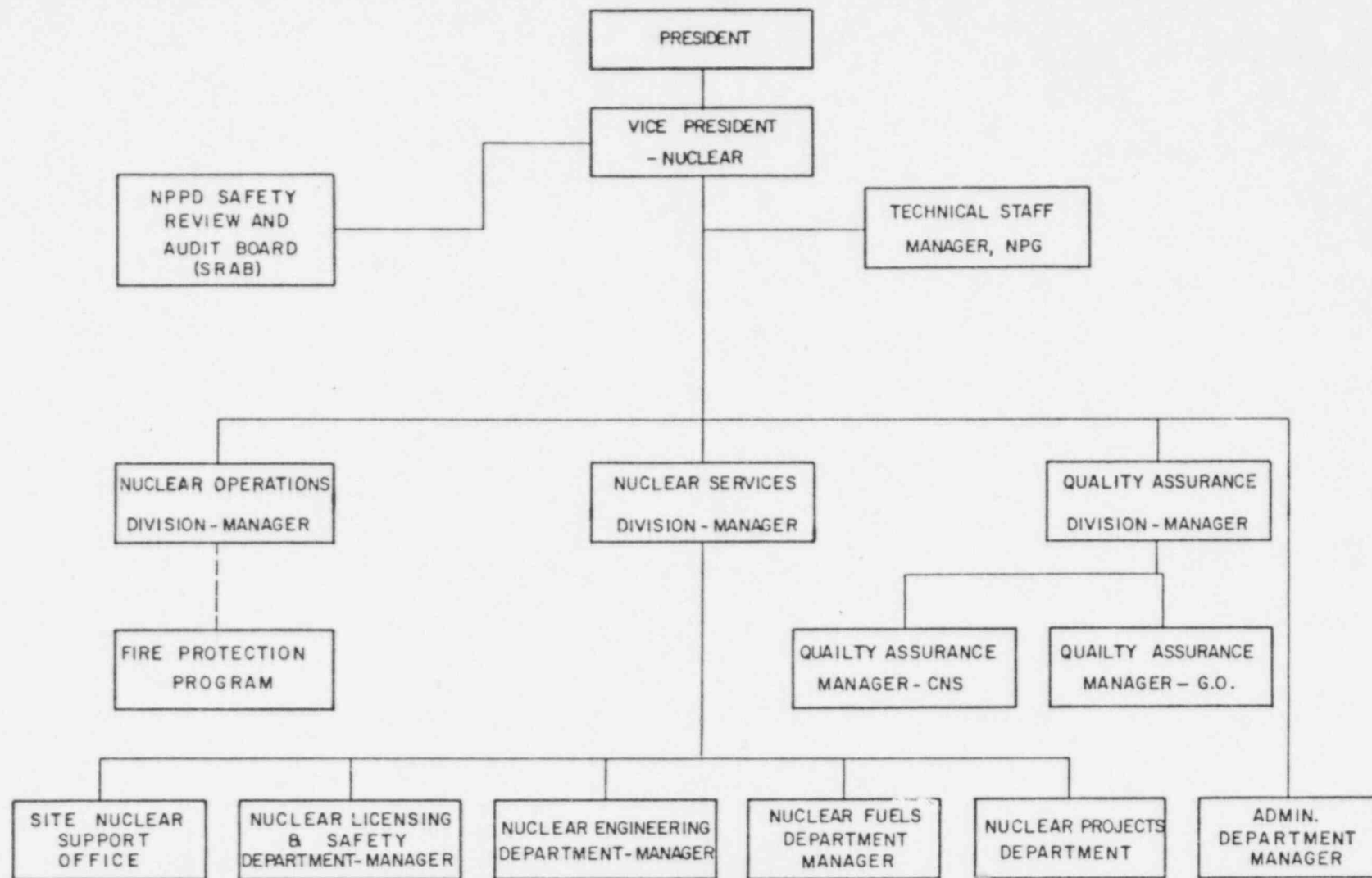


Figure 6.1.1  
NPPD Nuclear Power Group  
Organization Chart

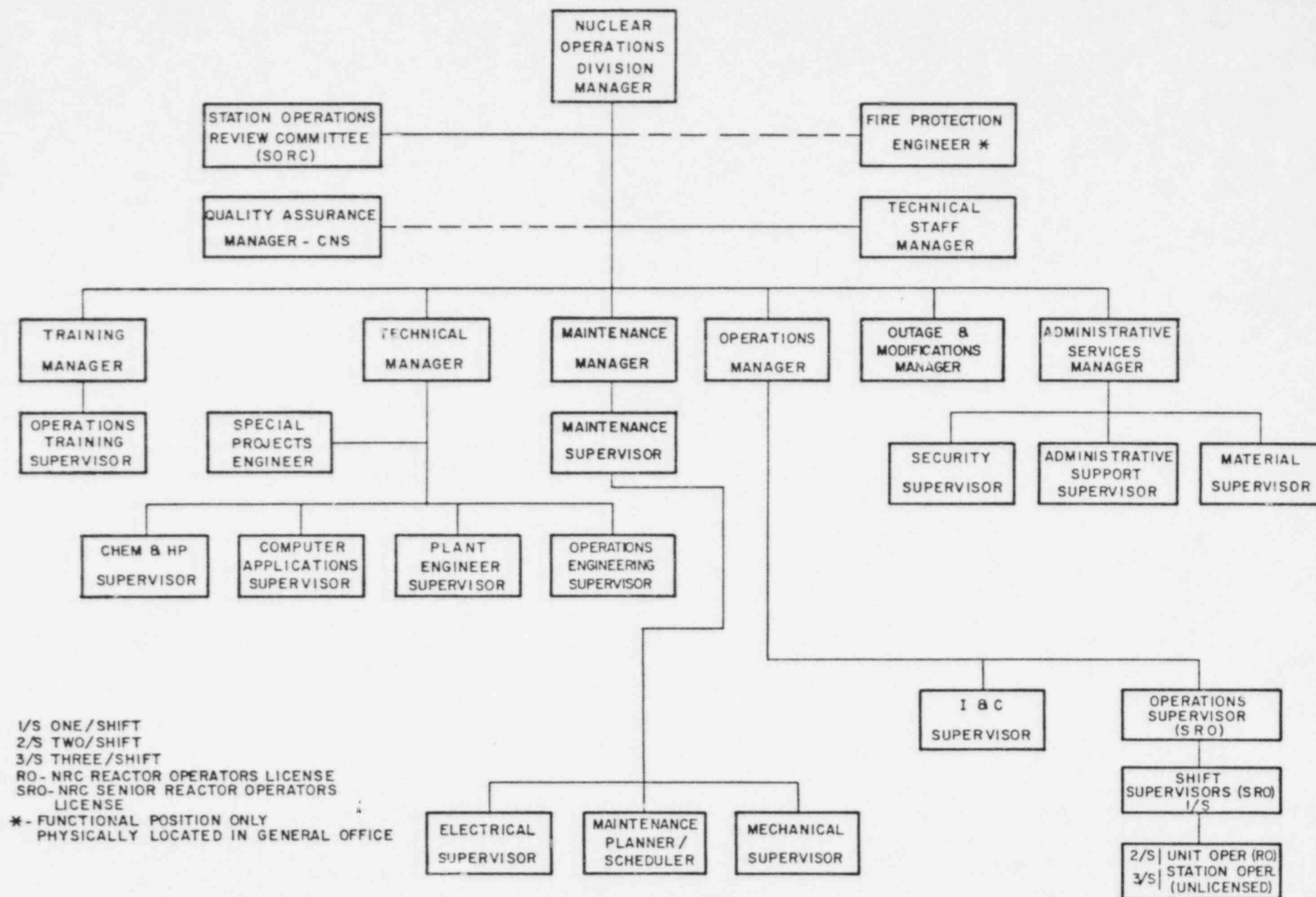


Figure 6.1.2  
NPPD Cooper Nuclear Station  
Organization Chart