



# Nebraska Public Power District

COOPER NUCLEAR STATION  
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NLS970002  
March 27, 1997

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: Proposed Change to CNS Technical Specifications:  
Conversion to Improved Standard Technical  
Specifications  
Cooper Nuclear Station  
NRC Docket No. 50-298, License No. DPR-46

Gentlemen:

In accordance with the provisions of 10 CFR 50.4 and 50.90, the Nebraska Public Power District (District) hereby submits a request for an amendment to license DPR-46 to change the Cooper Nuclear Station (CNS) Technical Specifications. This proposed amendment revises the CNS Technical Specifications to a format consistent with NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants, BWR 4."

The detailed description and justification for the proposed Technical Specification amendment consists of 11 volumes. A detailed description of the contents and organization of the 11 volumes is included as Attachments 1 through 3 of this letter. These attachments include:

Attachment 1, CNS Improved Technical Specification (ITS) Submittal Synopsis, which describes the organization and content of the submittal and the organization and content of each of the 11 volumes. This attachment is designed to facilitate distribution of each section within the NRC and to familiarize reviewers with the content and organization of each section.

Attachment 2, CNS ITS Conversion Document Status, which describes and provides the status of pending changes that are incorporated into this amendment request. This attachment also provides a list of the generic changes to NUREG-1433, Revision 1, that are incorporated into the CNS ITS amendment request. In addition, Attachment 2 identifies the change to the CNS Current Technical Specifications (CTS) that has been submitted for NRC review and is incorporated into the CNS ITS amendment request. This information is

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intended to facilitate District and NRC document control during the CNS ITS review and approval process.

Attachment 3, Significant Deviations From NUREG-1433 and CNS CTS. The purpose of this attachment is to identify those changes which are beyond the scope of both NUREG-1433 and the CNS CTS.

As a part of the overall conversion effort, CNS is adopting numerous new Surveillance Requirements (SRs). The new SRs are grouped into two categories (referred to in this letter as Category A and Category B SRs). Category A SRs are considered to be those SRs which are new in their entirety compared to current CNS Technical Specifications. Category B SRs are considered to be those current SRs which have been revised with ITS in some manner to be more restrictive than the current Technical Specifications.

CNS will be reviewing each Category A and B SR to determine which will not have been performed within the required ITS Surveillance Frequency at ITS implementation, based on the projected CNS ITS implementation date. CNS intends to put forth a good faith effort to perform these more restrictive surveillances prior to ITS implementation; however, due to difficulties in projecting what the exact status of the plant will be at the time of implementation and the variables associated with implementation (e.g., whether or not all of the more restrictive changes will be approved as currently written), CNS proposes that the Category A changes are assumed to be performed and met, in accordance with ITS SR 3.0.1, upon implementation of the ITS. Accordingly, the initial due date for each Category A SR will be determined based on: 1) the ITS implementation date, 2) the ITS frequency of the SR and 3) SR 3.0.2. CNS also proposes that the more restrictive Category B SRs are assumed to be performed and met, in accordance with ITS SR 3.0.1, upon implementation of the ITS. Accordingly, the due date for each Category B SR will be determined based on: 1) the last completion date of the associated CTS SR, 2) the ITS frequency of the SR and 3) SR 3.0.2.

CNS has determined that the approach discussed above will maintain compliance with the ITS and also provide the flexibility needed to implement the numerous new and more restrictive SRs which we have included as a part of our conversion to the Improved Standard Technical Specifications.

Implementation of the proposed amendment is tentatively scheduled for April 1, 1998 and is based on: 1) the training schedules for licensed and non-licensed personnel, 2) timing of the

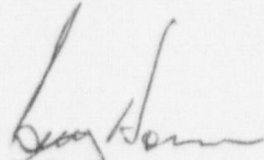
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implementation with respect to refueling outages, 3) the licensed operator examination schedule, and 4) the time required for procedure revisions and development of new programs. CNS ITS implementation is also predicated on NRC 1) issuance of the Safety Evaluation for the CNS ITS by December 1997, 2) issuance of the Safety Evaluation for the pending Thermal Hydraulic Stability Technical Specification Change Request (NLS970001) dated February 10, 1997, which has been incorporated into the ITS (see Attachment 2), and 3) approval of the SAFER/GESTR Loss of Coolant Accident Analysis submittal (NLS 970040) dated March 19, 1997. CNS will inform the NRC staff when the ITS implementation actions are complete.

By copy of this letter and its attachments, the appropriate State of Nebraska official is being notified in accordance with 10 CFR 50.91(b)(1). Copies to the NRC Region IV Office and the CNS Resident Inspector are also being provided in accordance with 10 CFR 50.4(b)(2).

Should you have any questions or require any additional information regarding this submittal, please contact Gautam Sen at (402) 825-5815.

Sincerely,



G.R. Horn  
Senior Vice-President of Energy Supply

/gsc

Attachments: 1 through 3

Enclosure: Improved Technical Specifications Conversion Document  
- CNS (11 Volumes)



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cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

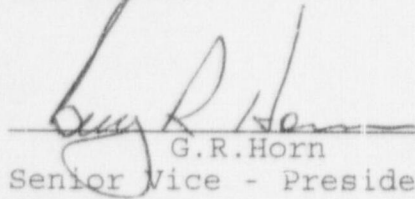
Technical Specifications Branch Chief (6 copies)  
Associate Director of Projects  
USNRC - NRR

Program Manager  
Environmental Health Division  
Department of Health  
State of Nebraska

STATE OF NEBRASKA)

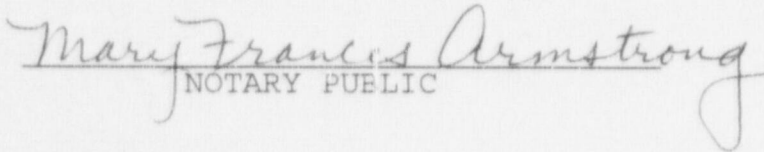
NEMAHA COUNTY)

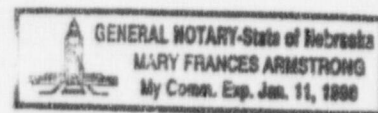
G. R. Horn, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this request on behalf of Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.

  
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G.R. Horn  
Senior Vice - President of Energy Supply

subscribe in my presence and sworn to before me this 27<sup>th</sup> day of March, 1997.

My commission expires: Jan. 11, 1998.

  
\_\_\_\_\_  
NOTARY PUBLIC



ATTACHMENT 1

COOPER NUCLEAR STATION  
NRC DOCKET NO. 50-298  
LICENSE NO. DPR-46  
REQUEST FOR LICENSE AMENDMENT

IMPROVED TECHNICAL SPECIFICATION (ITS) SUBMITTAL SYNOPSIS

The Cooper Nuclear Station (CNS) Improved Technical Specification (ITS) submittal consists of 11 volumes. This attachment describes each component of the CNS ITS submittal, and their organization within each volume. This attachment is designed to facilitate distribution of each CNS ITS section within the NRC and to familiarize reviewers with the content and organization of each section. A description of each volume included in the CNS ITS submittal follows.

Volume 1:

Volume 1 contains the Application of the Technical Specification Selection Criteria and a Relocation Matrix. This document lists each of the CNS Current Technical Specifications (CTS) and shows the results of CNS application of the 10 CFR 50.36 criteria for retention of requirements in Technical Specifications. For each of the CNS CTS, this document identifies whether or not the requirement is retained in the CNS ITS, and the basis for its retention or exclusion. For those CTS items that did not meet the selection criteria and have not been retained in the proposed ITS, a detailed explanation of the application of the selection criteria and justification for relocation is provided. The Relocation Matrix provides the document location for each relocated CTS requirement.

Volumes 2 through 11:

Volumes 2 through 11 contain the CNS Improved Technical Specifications and associated supporting documentation for the proposed amendment request. Volume 11 contains the CNS CTS mark-up pages in CTS order. Volumes 2 through 10 are ordered on a Chapter/Section basis, as follows, to facilitate distribution to NRC staff reviewers:

Volume 2:

CNS ITS Chapter	1.0, Use and Application
CNS ITS Chapter	2.0, Safety Limits
CNS ITS Section	3.0, Limiting Condition for Operation
	Applicability and Surveillance Requirement
	Applicability

<u>Volume 3:</u>	CNS ITS Section 3.1, Reactivity Control Systems
	CNS ITS Section 3.2, Power Distribution Limits
<u>Volumes 4 &amp; 5:</u>	CNS ITS Section 3.3, Instrumentation
<u>Volume 6:</u>	CNS ITS Section 3.4, Reactor Coolant System
	CNS ITS Section 3.5, Emergency Core Cooling Systems and Reactor Core Isolation Cooling System
<u>Volume 7:</u>	CNS ITS Section 3.6, Containment Systems
<u>Volume 8:</u>	CNS ITS Section 3.7, Plant Systems
<u>Volume 9:</u>	CNS ITS Section 3.8, Electrical Systems
<u>Volume 10:</u>	CNS ITS Section 3.9, Refueling Operations
	CNS ITS Section 3.10, Special Operations
	CNS ITS Chapter 4.0, Design Features
	CNS ITS Chapter 5.0, Administrative Controls

Each volume (2 through 10) contains the CNS ITS Specifications and Bases, a mark-up of the CNS CTS, a discussion of changes to the CNS CTS, the No Significant Hazards Considerations for each of the changes to the CTS, and mark-up of NUREG-1433, Revision 1 to indicate the CNS ITS and justifications for deviations from the NUREG. Each Chapter/Section in a volume is organized as follows:

Tab: CNS Improved Technical Specifications

This tab contains the proposed CNS Improved Technical Specifications.

Tab: CNS Improved Technical Specification Bases (as applicable)

This tab contains the proposed CNS Improved Technical Specification Bases.

Tab : Markup of CNS Current Technical Specifications and Discussion of Changes Being Made to the CNS CTS

This tab contains a copy of the CNS CTS pages annotated to provide a cross-reference to the equivalent CNS ITS requirement, showing the disposition of the existing requirements into the CNS ITS.



The annotated copy of the CNS CTS pages are marked with sequentially numbered "boxes" which provide a cross-reference to a Discussion of Changes (DOCs) between the CNS CTS and the CNS ITS. The ITS number is noted on the top right corner of each CTS page, identifying the ITS LCO where the CTS requirement is located. Items on the CTS page that are located in one or more ITS locations or sections have the appropriate location(s) noted adjacent to the items. When the ITS requirement differs from the CTS requirement, the CTS being revised is annotated with an alpha-numeric designator. This designator relates to the appropriate DOC. Each DOC provides a justification for the proposed change. The DOC for each ITS section immediately follows the marked up CTS pages. The alpha-numeric designator also relates the proposed change to the applicable No Significant Hazardous Consideration (NSHC).

The alpha-numeric designator is based on the category of the change and a sequential number within that category. The changes to the CNS CTS are categorized as follows:

- A ADMINISTRATIVE - associated with restructuring, interpretation, and complex rearranging of requirements, and other changes not substantially revising an existing requirement. There is a single No Significant Hazards Consideration (NSHC) for this category.
- M TECHNICAL CHANGES - MORE RESTRICTIVE - changes to the CTS being proposed in converting to the ITS, resulting in added restrictions or eliminating flexibility. There is a single NSHC for this category.
- L TECHNICAL CHANGES - LESS RESTRICTIVE - changes where requirements are relaxed, relocated, eliminated, or new flexibility is provided. There are two groups of changes - "Generic" and "Specific" in this category. Each "Specific" LESS RESTRICTIVE change has a corresponding unique No Significant Hazards Consideration (NSHC). The "Generic" LESS RESTRICTIVE changes are subdivided into 3 subcategories, each of which is identified uniquely as either LA, LB, or L.AV changes. Each subcategory of "Generic" LESS RESTRICTIVE change is justified by a single NSHC. The subcategories and their designation are as follows:

The "A" changes consist of relocation of details out of the CTS and into the Bases, UFSAR, QA Manual, or other plant controlled documents. Typically, this involves details of system design and function or procedural details on methods of conducting a surveillance.



The "LB" changes are related to the extension of an instrument Completion Time or Surveillance Frequency in accordance with NRC approved vendor topical reports.

The "L.AV" changes reflect modifying the instrumentation Allowable Values to be consistent with the current calculations performed in accordance with the plant specific setpoint methodology.

- R RELOCATED - specific requirements that do not meet the NRC Technical Specification selection criteria. These items are being relocated to other plant documents as part of the conversion to ITS. There is a single NSHC for this category.

Tab: Markup of NUREG-1433, Revision 1 Technical Specifications and Justifications for Deviations

This tab contains a copy of NUREG-1433, Revision 1, Technical Specifications which have been annotated to indicate deviations between the NUREG (as modified by generic changes identified in Attachment 2 of this letter) and the proposed CNS ITS. Justifications for each of the deviations are provided with the individual ITS Specifications. The annotated copy of NUREG-1433, Revision 1, and the discussion of the deviations are cross-referenced by "boxes" which are numbered sequentially for each Specification.

Each line item in the annotated copy of NUREG-1433, Revision 1, Technical Specifications contains a cross-reference to the equivalent CNS CTS requirement and/or discussion of change, as appropriate. This cross-reference is intended to provide reviewers with a quick reference to the equivalent CTS section

Tab: Markup of NUREG-1433, Revision 1 Technical Specifications Bases and Justifications for Deviations

This tab contains a copy of NUREG-1433, Revision 1, Technical Specifications Bases which have been annotated to indicate deviations between the NUREG Bases (as modified by generic changes identified in Attachment 2 of this letter) and the proposed CNS ITS Bases. Justifications for the deviations are provided with the individual ITS Specifications. The annotated copy of NUREG-1433, Revision 1, and the discussion of the deviations are cross-referenced by "boxes" which are numbered sequentially for each Specification.

Tab: No Significant Hazards Considerations

This tab contains the required 10 CFR 50.92 No Significant Hazards Considerations (NSHCs) for the proposed changes and demonstrates that the changes associated with the corresponding ITS section do not constitute a significant hazard consideration. As described for the DOC, the NSHCs are categorized as Administrative, Relocated, More Restrictive, Less Restrictive - Generic, and Less Restrictive - Specific, and are identified by an alpha-numeric designator relating the marked-up CTS and the DOC to the applicable NSHC.