



**Nebraska Public Power District**  
*Nebraska's Energy Leader*

NLS2000084  
September 28, 2000

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

**Subject:** Withdrawal of Proposed Change to CNS Technical Specifications  
Ventilation Filter Testing Program Reference  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

- Reference:**
- 1) Nebraska Public Power District Letter (NLS990027) from John H. Swailes to U.S. Nuclear Regulatory Commission, dated June 8, 1999, Proposed Change to CNS Technical Specifications, Ventilation Filter Testing Program Reference
  - 2) Letter from Jack N. Donohew (U.S. Nuclear Regulatory Commission) to G. R. Horn (Nebraska Public Power District) dated July 31, 1998, Conversion to Improved Technical Specifications for the Cooper Nuclear Station - Amendment No. 178 to the Facility Operating License No. DPR-46 (TAC No. M98317)

In Reference 1, the Nebraska Public Power District (District) submitted to the Nuclear Regulatory Commission (NRC) a proposed change to the Cooper Nuclear Station (CNS) Technical Specifications (TS), Section 5.5.7, "Ventilation Filter Testing Program." This change would revise TS Section 5.5.7.e by replacing the reference to ASME N510-1980, Section 14.5.1 with a general description of the methodology to be used for demonstrating the heat dissipation capability of the heaters for the Standby Gas Treatment (SBGT) System. The proposed change was in response to an error introduced into the CNS TS during the conversion to Improved Technical Specifications (ITS) for BWR-4's.

The original change to ITS correctly characterized the conversion as administrative only. The associated surveillance procedure requirements for demonstrating heater operability remained unchanged (no technical changes made) during the conversion to ITS. Consistent with this, Section 5.5.7, as it specifically pertains to the Ventilation Filter Testing Program was categorized as an administrative change in the NRC Safety Evaluation Report for ITS (Reference 2).

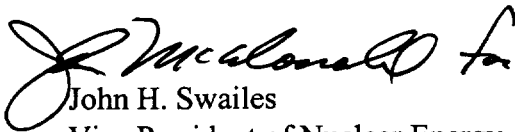
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In Reference 1, the District had characterized the proposed TS change as an administrative change consisting of a correction of an error in the ASME N510 reference and a clarification of a testing methodology. However, in subsequent telephone communications between the NRC Nuclear Reactor Regulation Project Manager for CNS and the CNS Assistant Licensing Manager, it was agreed that the subject change is more complex and that the District needs to perform additional work to justify the proposed TS change. As such, the District is withdrawing the subject proposed change. The District will submit a new proposed change concerning TS Section 5.5.7.e (heater testing) no later than November 30, 2000. In the interim, the District will continue to perform the heater testing as required by CNS surveillance procedures.

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

Should you have any questions concerning this matter, please contact Sharon Mahler at (402) 825-5236.

Sincerely,



John H. Swailes  
Vice President of Nuclear Energy

/cb

cc: Regional Administrator  
USNRC - Region IV

Senior Project Manager  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector  
USNRC

Environmental Health Division - Program Manager

NPG Distribution

## ATTACHMENT 3 LIST OF NRC COMMITMENTS

Correspondence Number: NLS2000084

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the NL&S Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

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