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Docket No. 50-298

Nebraska Public Power District
 ATTN: Mr. J. M. Pilant, Manager
 Licensing and Quality Assurance
 Post Office Box 499
 Columbus, Nebraska 68601

Gentlemen:

The Commission has issued the enclosed Amendment No. 15 to Facility License No. DPR-46 for the Cooper Nuclear Station. The amendment includes Change No. 18 to the Technical Specifications and is in response to your request dated September 9, 1975.

The amendment revises the Technical Specifications for the facility to change the retention period for certain types of records from "life of plant" to "at least five years."

Copies of the related Safety Evaluation Report and Federal Register Notice are also enclosed.

Sincerely,

Original signed by
 Dennis L. Ziemann

Dennis L. Ziemann, Chief
 Operating Reactors Branch #2
 Division of Reactor Licensing

Enclosures:

1. Amendment No. 15 to License DPR-46 with Change No. 18
2. Safety Evaluation Report
3. Federal Register Notice

cc w/enclosures:
 See next page

cert.

[Handwritten signature]

Cont'd by DLZ 11/19/75

OFFICE >	RL:ORB #2	RL:ORB #2	RL:ORB #2	OELD	RL:ORB #2
SURNAME >	RMDiggs	MFletcher	RDSilver:ro	Smith, B	DLZiemann
DATE >	11/6/75	11/6/75	11/6/75	11/11/75	11/2/75

DEC 2 1975

cc: w/enclosures:

Gene Watson, Attorney
Barlow, Watson & Johnson
P. O. Box 81686
Lincoln, Nebraska 68501

Mr. Arthur C. Gehr, Attorney
Snell & Wilmer
400 Security Building
Phoenix, Arizona 85004

Auburn Public Library
1118 - 15th Street
Auburn, Nebraska 68305

Mr. William Siebert, Commissioner
Nemaha County Board of Commissioners
Nebraska County Courtroom
Auburn, Nebraska 68305

cc: w/enclosures and by of NPPD's
filing dtd. 9/9/75

Mr. D. Drain, Director
Department of Environmental Control
Executive Building, 2nd Floor
Lincoln, Nebraska 68509

NEBRASKA PUBLIC POWER DISTRICT

DOCKET NO. 50-298

COOPER NUCLEAR STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 15
License No. DPR-46

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Nebraska Public Power District (the licensee) dated September 9, 1975, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations; and
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.
2. Accordingly, the license is amended by a change to the Technical Specifications as indicated in the attachment to this License amendment and Paragraph 2.C(2) of Facility License No. DPR-46 is hereby amended to read as follows:

OFFICE						
SURNAME						
DATE						

"C(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications, as revised by issued changes thereto through Change No. 19."

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by
Dennis L. Ziemann

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Reactor Licensing

Attachment:
Change No. 18 to the
Technical Specifications

Date of Issuance: **DEC 2 1975**

OFFICE >						
SURNAME >						
DATE >						

ATTACHMENT TO LICENSE AMENDMENT NO. 15
CHANGE NO. 18 TO THE TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSE NO. DPR-46
DOCKET NO. 50-298

Replace pages 235 and 235a with the attached revised pages bearing the same numbers. Changed areas on the revised pages are reflected by marginal lines.

OFFICE >						
SURNAME >						
DATE >						

6.6 Station Operating Records

6.6.1 Records and/or logs relative to the following items shall be kept in a manner convenient for review and shall be retained for at least 5 years unless a longer period is required by applicable regulations.

- A. Records of normal station operation, including power levels and periods of operation at each power level.
- B. Records of periodic checks, inspection and/or calibrations performed to verify that Surveillance Requirements are being met.
- C. Records of principal maintenance activities, including inspection, repair, substitution or replacement of principal items of equipment pertaining to nuclear safety.
- D. Records of occurrences and safety limit violations as specified in 6.4 and 6.5.
- E. Record of changes to plant procedures.
- F. Records of special tests and experiments.
- G. Records of wind speed and direction.

6.6.2 Records and logs relating to the following items shall be kept for the life of the plant.

- A. Records of changes made to the station as described in the Safety Analysis Report and amendments and reflected in updated, corrected and as-built drawings and records.
- B. Records of new and spent fuel inventory and assembly histories.
- C. Records of station radiation and contamination surveys.
- D. Records of off-site environmental monitoring surveys.
- E. Records of radiation exposure for all station personnel, including all contractors and visitors to the station in accordance with 10 CFR 20.
- F. Records of radioactivity in liquid and gaseous wastes released to the environment.
- G. Design Fatigue Usage Evaluation
 - 1. Monitoring, recording, evaluating, and reporting requirements contained in Section 6.7.3.A.2, will be met for various portions of the reactor coolant pressure boundary (RCPB) for which detailed fatigue

6.6 (cont'd.)

usage evaluation per the ASME Boiler and Pressure Vessel Code Section III was performed¹ for the conditions defined in the design specification. The locations to be monitored shall be:

- a. The feedwater nozzles
- b. The shell at or near the waterline
- c. The flange studs

2. Monitoring, Recording, Evaluating, and Reporting

- a. Operational transients that occur during plant operations will, at least semi-annually, be reviewed and compared to the transient conditions defined in the component stress report for the locations listed in 1 above, and used as a basis for the existing fatigue analysis.
- b. The number of transients which are comparable to or more severe than the transients evaluated in the stress report Code fatigue usage calculations will be recorded in an operating log book. For those transients which are more severe, available data, such as the metal and fluid temperatures, pressures, flow rates, and other conditions will be recorded in the log book.
- c. The number of transient events that exceed the design specification quantity and the number of transient events with a severity greater than that included in the existing Code fatigue usage calculations shall be added. When this sum exceeds the predicted number of design condition events by twenty-five², a fatigue usage evaluation of such events will be performed for the affected portion of the RCPB.

- H. Records of individual plant staff members showing qualifications, training and retraining.

1. See paragraph N-415.2, ASME Section III, 1965 Edition.

2. The Code rules permit exclusion of twenty-five-(25) stress cycles from secondary stress and fatigue usage evaluation. (See paragraphs N-412(t)(3) and N-417.10(f) of the Summer 1968 Addenda to ASME Section III, 1968 Edition.)

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 15 TO DPR-46

CHANGE NO. 18 TO TECHNICAL SPECIFICATIONS

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

INTRODUCTION

By letter dated September 9, 1975, Nebraska Public Power District (NPPD) requested changes to the Radiological Technical Specifications appended to Facility Operating License No. DPR-46 for the Cooper Nuclear Station (CNS). The proposed changes in the Administrative Controls, Section 6, of the Radiological Technical Specifications are concerned with CNS operating record retention times. The proposed change would revise the retention times of the following records from "the life of the plant" to "at least five years":

1. Records of principal maintenance activities, including inspection, repair, substitution or replacement of principal items of equipment pertaining to nuclear safety.
2. Records of abnormal occurrences and safety limit violations as defined in 6.4.

DISCUSSION

The NRC Staff position on maintenance and storage of power plant records is contained in Regulatory Guide 1.88 which endorses ANSI-N45.2.9 - 1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants." Appendix A, Section A.6 of ANSI-N45.2.9 - 1974 recommends that records of principal maintenance activities, including inspection, repair, substitution or replacement of principal items of equipment pertaining to nuclear safety and also abnormal occurrence records be maintained for at least five years.

Current guidance for reporting operating information, as stated in Regulatory Guide 1.16, Revision 4, reserves the term "abnormal occurrence" for those events which the NRC determines to be significant

from the standpoint of public health or safety. The licensee does not identify any event as an "abnormal occurrence." Consequently, license amendment No. 13 deleted the term "abnormal occurrence" from the CNS Technical Specifications. The type of occurrence formerly called "abnormal" is still reportable to the Commission. These occurrences and events leading to safety limit violations are now categorized as reportable events.

We have reviewed the proposed change and have concluded that NPPD's request for a change in the retention times of the aforementioned reports conforms to Regulatory Guide 1.88 and is therefore acceptable. However, since publication of Regulatory Guide 1.16, Revision 4, a modification to the proposed change is necessary to delete the term "abnormal occurrence." We have concluded that "Records of occurrences and safety limit violations as specified in 6.4 and 6.5" is an acceptable substitute for "Records of abnormal occurrences and safety limit violations as defined in 6.4" in the Station Operating Records section of the CNS Technical Specifications.

CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) because the change does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the change does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

DATE: DEC 2 1975

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-298

NEBRASKA PUBLIC POWER DISTRICT

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY LICENSE

Notice is hereby given that the U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 15 to Facility Operating License No. DPR-46, issued to the Nebraska Public Power District (the licensee), which revised Technical Specifications for operation of the Cooper Nuclear Station (the facility) located in Nemaha County, Nebraska. The amendment is effective as of its date of issuance.

This amendment revises the Administrative Controls Section of the Technical Specifications for the facility to change the record retention period (for principal maintenance activities and reportable occurrences) from "for the life of the plant" to "for at least five years" consistent with current requirements.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment is not required since the amendment does not involve a significant hazards consideration.

For further details with respect to this action, see (1) the application for amendment dated September 9, 1975, (2) Amendment No. 15 to License No. DPR-46, with Change No. 18 and (3) the Commission's concurrently issued Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C. and at the Auburn Public Library, 1118 - 15th Street, Auburn, Nebraska 68305. A copy of items (2) and (3) may be obtained upon request addressed to the United States Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Reactor Licensing.

Dated at Bethesda, Maryland, this *2nd day of December, 1975.*

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by
Dennis L. Ziemann

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Reactor Licensing

988

OFFICE ➤	RL:ORB #2	RL:ORB #2	RL:ORB #2	OELD	RL:ORB #2
SURNAME ➤	<i>RM [Signature]</i>	<i>MH [Signature] cher</i>	<i>RDSilver:ro</i>	<i>Smith, B</i>	DLZiemann
DATE ➤	<i>11/6/75</i>	<i>11/6/75</i>	<i>11/6/75</i>	<i>11/11/75</i> <i>11/19/75</i>	<i>12/2/75</i>

PRELIMINARY DETERMINATION

NOTICING OF PROPOSED LICENSING AMENDMENT

50-298

Licensee: Nebraska Public Power District (Cooper Nuclear Station)

Request for: Align Technical Specifications Record Retention Requirements with
ANSI-N 45.2.9

Request Date: September 9, 1975

- Proposed Action:**
- () Pre-notice Recommended
 - (^X) Post-notice Recommended
 - () Determination delayed pending completion of Safety Evaluation

Basis for Decision: Since the proposed amendment pertains only to an
administrative change it does not institute a significant
hazards consideration as defined in RLOP 601, paragraph B
and therefore does not require pre-noticing. Furthermore,
this amendment fits item 2 of enclosure 3b to RLOP 601 as
as example of itmes that need not be pre-noticed.

EJP

CONCURRENCES:

DATE:

1. *M. W. Fletcher*
M. W. Fletcher
2. *D. L. Ziemann*
D. L. Ziemann
3. *K. R. Goller* **KRG** **10/1/75**
4. *Gallo* **10/1/75**
Office of Executive Legal Director