

March 20, 1984

Docket No. 50-298

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

Dear Mr. Pilant:

The Commission has issued the enclosed Amendment No. 85 to Facility Operating License No. DPR-46 for the Cooper Nuclear Station. The amendment consists of changes to the Technical Specifications in response to your application dated October 26, 1983.

The amendment revises the Technical Specifications to (1) reflect the recent reorganization of the nuclear operations at Nebraska Public Power District and Cooper Nuclear Station, and (2) correct various typographical errors.

A copy of the related Safety Evaluation is also enclosed.

Sincerely,

Original signed by/

Byron L. Siegel, Project Manager
Operating Reactors Branch #2
Division of Licensing

Enclosures:

1. Amendment No. 85 to License No. DPR-46
2. Safety Evaluation

cc w/enclosures:

See next page

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Mr. J. M. Pilant
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Cooper Nuclear Station

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

NEBRASKA PUBLIC POWER DISTRICT
DOCKET NO. 50-298
COOPER NUCLEAR STATION
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 85
License No. DPR-46

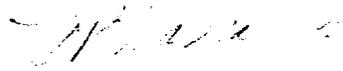
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Nebraska Public Power District dated October 26, 1983, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations 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;
 - 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; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the licensee is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C(2) of Facility Operating License No. DPR-46 is hereby amended to read as follows:

(2) Technical Specification

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 85, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

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

FOR THE NUCLEAR REGULATORY COMMISSION



Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 20, 1984

ATTACHMENT TO LICENSE AMENDMENT NO. 85

FACILITY OPERATING LICENSE NO. DPR-46

DOCKET NO. 50-298

Revise the Appendix A Technical Specifications as follows. The revised areas are indicated by marginal lines.

<u>Remove</u>	<u>Insert</u>
iv	iv
v	-
219	219
219a	219a
220	220
221	221
222	222
223	223
224	224
225	225
226	226
226a	226a
236	236
237	237

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6.0 ADMINISTRATIVE CONTROLS

6.1 ORGANIZATION

6.1.1 Responsibility

The Division Manager of Nuclear Operations shall have the over-all fulltime onsite responsibility for the safe operation of the Cooper Nuclear Station. During periods when the Division Manager of Nuclear Operations is unavailable, he may delegate his responsibility to one of the managers in the Nuclear Operations Division.

6.1.2 Offsite

The portion of the Nebraska Public Power District management which relates to the operation of this station is shown in Figure 6.1.1.

6.1.3 Plant Staff - Shift Complement

The organization for conduct of operation of the station is shown in Fig. 6.1.2. The shift complement at the station shall at all times meet the following requirements. Note: Higher grade licensed operators may take the place of lower grade licensed or unlicensed operators.

- A. A licensed senior reactor operator (SRO) shall be present at the station at all times when there is any fuel in the reactor.
- B. A licensed reactor operator shall be in the control room at all times when there is any fuel in the reactor.
- C. Two licensed reactor operators shall be in the control room during all startup, shutdown and other periods involving significant planned control rod manipulations. A licensed SRO shall either be in the Control Room or immediately available to the Control Room during such periods.
- D. A licensed senior reactor operator (SRO) with no other concurrent duties shall be directly in charge of any refueling operation, or alteration of the reactor core.

A licensed reactor operator (RO) with no other concurrent duties shall be directly in charge of operations involving the handling of irradiated fuel other than refueling or reactor core alteration operations.

- E. An individual who has been trained and qualified in health physics techniques shall be on site at all times that fuel is on site.
- F. Minimum crew size during reactor operation shall consist of three licensed reactor operators (one of whom shall be licensed SRO) and three unlicensed operators. Minimum crew size during reactor cold shutdown conditions shall consist of two licensed reactor operators (one of whom shall be licensed SRO) and one unlicensed operator.

In the event that any member of a minimum shift crew is absent or incapacitated due to illness or injury a qualified replacement shall be designated to report on-site within two hours.

- G. A Fire Brigade of at least 5 members shall be maintained at all times. This excludes the 3 members of the minimum shift crew necessary for safe shutdowns, and other personnel required for other essential functions during a fire emergency. Three fire Brigade members shall be from the Operations Department and 2 support members may be from other departments inclusive of Security personnel.

Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to within the minimum requirements.

6.1.4 Plant Staff - Qualifications

The minimum qualifications, training, replacement training, and retraining of plant personnel at the time of fuel loading or appointment to the active position shall meet the requirements as described in the American National Standards Institute N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants". The Chemistry and Health Physics Supervisor shall meet or exceed the qualifications of Regulatory Guide 1.8, Sept. 1975; personnel qualification equivalency as stated in the Regulatory Guide may be proposed in selected cases. The minimum frequency of the retraining program shall be every two years. The training program shall be under the direction of the Training Manager.

- A. A training program for the fire brigade will be maintained under the direction of the Training Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code 1976, except for Fire Brigade training sessions which shall be held at least quarterly.

The training program requirements will be provided by a qualified fire protection engineer.

6.2

REVIEW AND AUDIT

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. Reactor Engineer Supervisor
- k. Computer Applications Supervisor
- l. 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 Assistant General Manager - 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 events which are required by Technical Specifications to be reported to the NRC in writing within 24 hours.
- 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 Assistant General Manager - 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-

6.2 (Cont'd)

tary material reviewed; copies of the minutes shall be forwarded to the Chairman of the NPPD Safety Review and Audit Board and the Assistant General Manager - 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.

6.2 (cont'd)

1. Membership:
 - a. Chairman
 - b. Vice-Chairman
 - c. Five Members
 - d. Consultants (as required)

The Board members shall collectively have the capability required to review problems in the following areas: nuclear power plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, instrumentation and control, radiological safety, mechanical and electrical engineering, quality assurance practices, and other appropriate fields associated with the unique characteristics of the nuclear power plant involved. When the nature of a particular problem dictates, special consultants will be utilized.

Alternate members shall be appointed in writing by the Board Chairman to serve on a temporary basis; however, no more than two alternates shall serve on the Board at any one time.

2. Meeting frequency: Semiannually, and as required on call of the Chairman.
3. Quorum: Chairman or Vice Chairman, plus four members including alternates. No more than a minority of the quorum shall be from groups holding line responsibility for the operation of the plant.
4. Review: The following subjects shall be reported to and reviewed by the NPPD Safety Review and Audit Board.
 - a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
 - b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.

6.2 (cont'd)

- 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 events which are required by Technical Specifications to be reported to the NRC in writing within 24 hours.
 - 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 Assistant General Manager - 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 Assistant General Manager - 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:

6.3 PROCEDURES AND PROGRAMS

6.3.1 Introduction

Station personnel shall be provided detailed written procedures to be used for operation and maintenance of system components and systems that could have an effect on nuclear safety.

6.3.2 Procedures

Written procedures and instructions including applicable check off lists shall be provided and adhered to for the following:

- A. Normal startup, operation, shutdown and fuel handling operations of the station including all systems and components involving nuclear safety.
- B. Actions to be taken to correct specific and foreseen potential or actual malfunctions of safety related systems or components including responses to alarms, primary system leaks and abnormal reactivity changes.
- C. Emergency conditions involving possible or actual releases of radioactive materials.
- D. Implementing procedures of the Security Plan and the Emergency Plan.
- E. Implementing procedures for the fire protection program.
- F. Administrative procedures for shift overtime.

6.3.3 Maintenance and Test Procedures

The following maintenance and test procedures will be provided to satisfy routine inspection, preventive maintenance programs, and operating license requirements.

- A. Routine testing of Engineered Safeguards and equipment as required by the facility License and the Technical Specifications.
- B. Routine testing of standby and redundant equipment.
- C. Preventive or corrective maintenance of plant equipment and systems that could have an effect on nuclear safety.
- D. Calibration and preventive maintenance of instrumentation that could affect the nuclear safety of the plant.
- E. Special testing of equipment for proposed changes to operational procedures or proposed system design changes.

6.3.4 Radiation Control Procedures

Radiation control procedures shall be maintained and made available to all station personnel. These procedures shall show permissible radiation exposure, and shall be consistent with the requirements of 10 CFR 20.

6.3 (cont'd)

A. High Radiation Areas

In lieu of the "control device" or "alarm signal" required by Paragraph 20.203 (c) (2) of 10 CFR 20 each High Radiation Area (100 mrem/hr or greater) shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by requiring notification and permission of the shift supervisor. Any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.

6.3.5 Temporary Changes

Temporary changes to procedures which do not change the intent of the original procedure may be made, provided such changes are approved by two members of the operating staff holding SRO licenses. Such changes shall be documented and subsequently reviewed by the Division Manager of Nuclear Operations within one month.

6.3.6 Exercise of Procedures

Drills of the Emergency Plan procedures shall be conducted annually, including a check of communications with offsite support groups. Drills on the procedures specified in 6.3.2.A, B, and C above shall be conducted as part of the retraining program.

6.3.7 Programs

The following programs shall be established:

A. Systems Integrity Monitoring Program

A program shall be established to reduce leakage to as low as practical levels from systems outside the primary containment during a serious accident that would or could contain highly radioactive fluids. This program shall include provisions establishing preventive maintenance and periodic visual inspection requirements, and leak testing requirements for each system at a frequency not to exceed refueling cycle intervals.

B. Iodine Monitoring Program

A program shall be established to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include training of personnel, procedures for monitoring and provisions for maintenance of sampling and analysis equipment.

C. Environmental Qualification Program

A. By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff

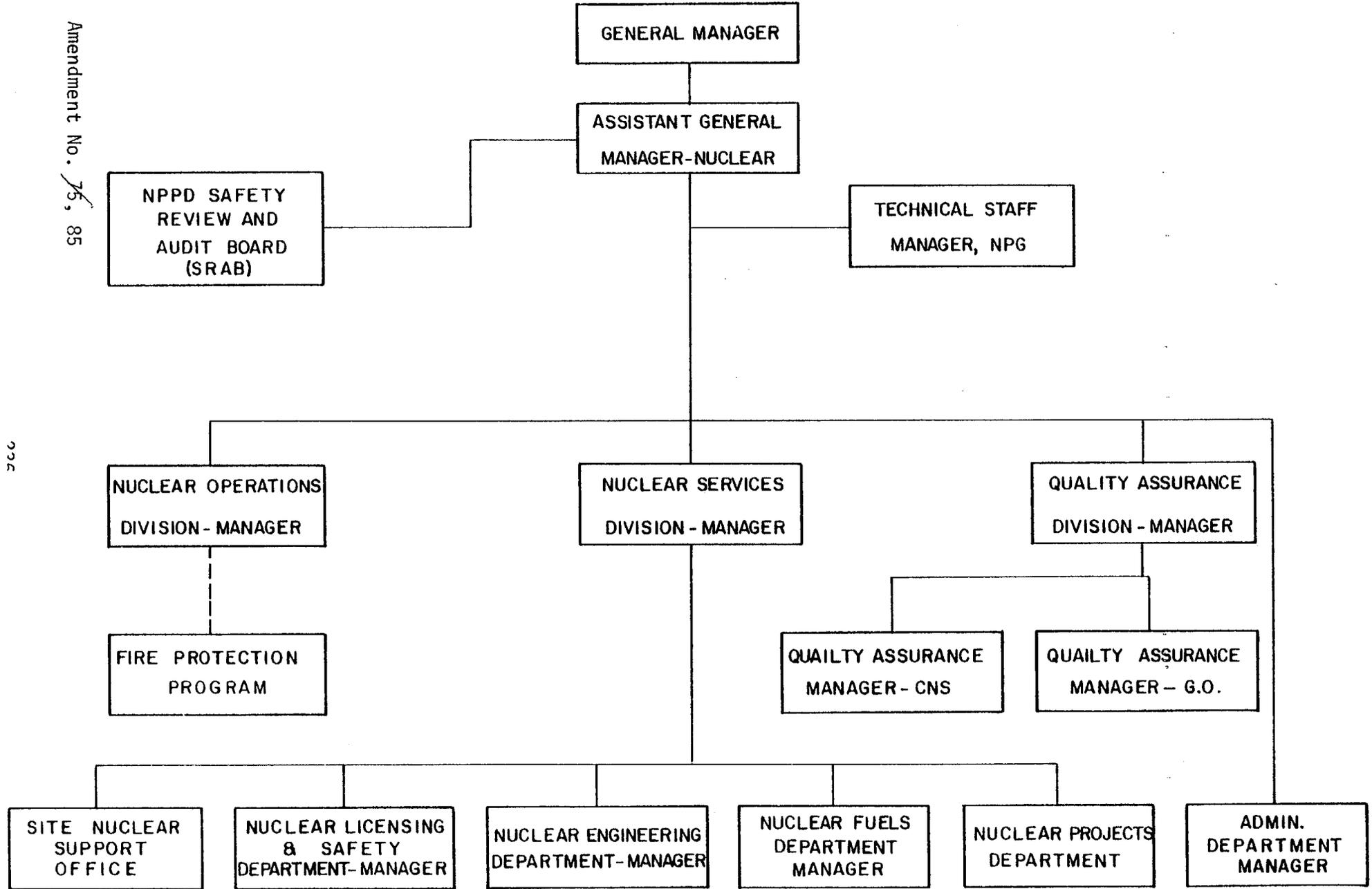
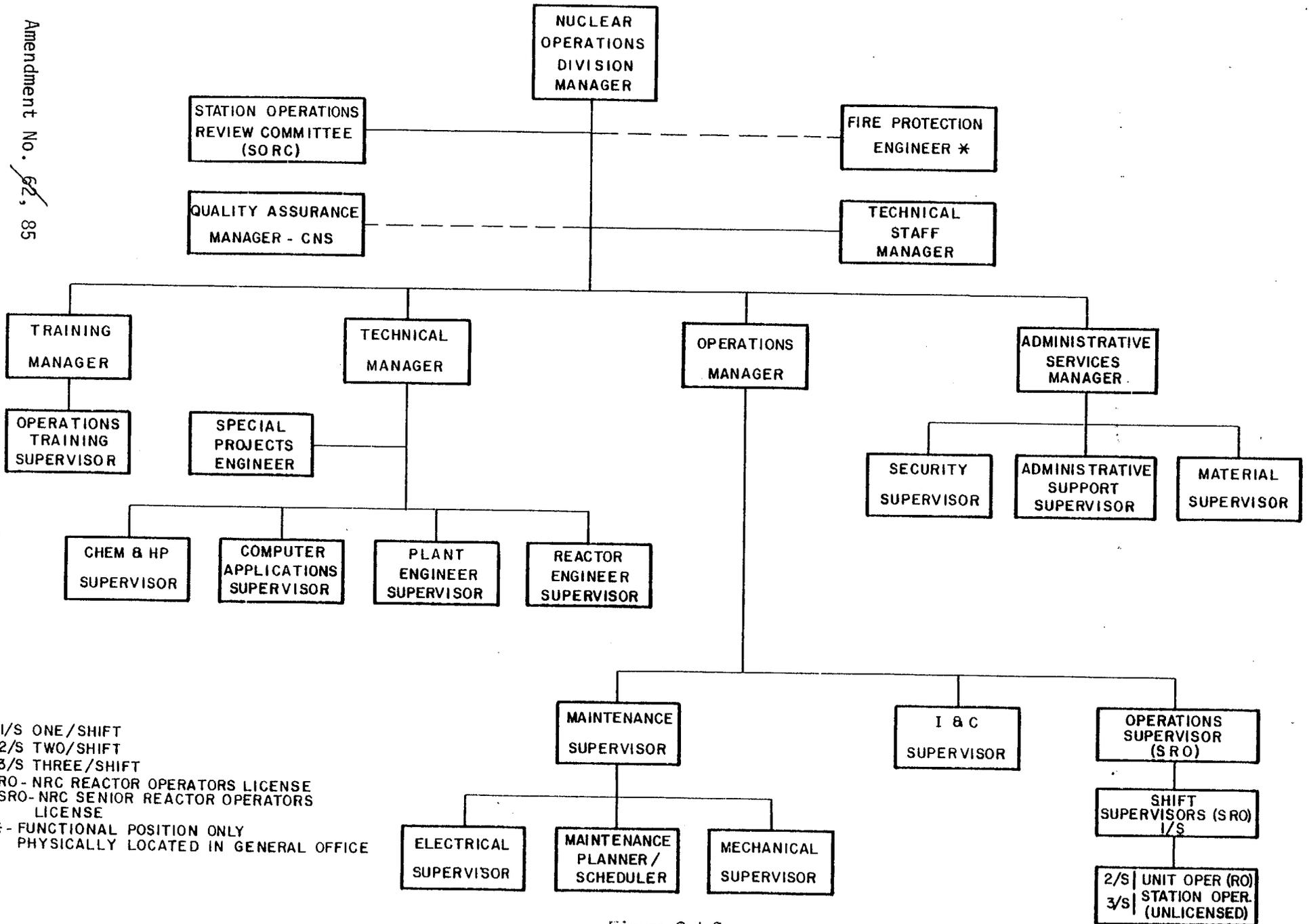


Figure 6.1.1
NPPD Nuclear Power Group
Organization Chart



1/S ONE/SHIFT
 2/S TWO/SHIFT
 3/S THREE/SHIFT
 RO - NRC REACTOR OPERATORS LICENSE
 SRO - NRC SENIOR REACTOR OPERATORS LICENSE
 * - FUNCTIONAL POSITION ONLY
 PHYSICALLY LOCATED IN GENERAL OFFICE

Figure 6.1.2
 NPPD Cooper Nuclear Station
 Organization Chart

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 85 TO LICENSE NO. DPR-46

NEBRASKA PUBLIC POWER DISTRICT

DOCKET NO. 50-298

COOPER NUCLEAR STATION

1.0 Introduction

This amendment incorporates provisions into the Technical Specifications that would: (1) reflect recent reorganization of the nuclear operations at Nebraska Public Power District (NPPD) and Cooper Nuclear Station (CNS) and (2) correct various typographical errors.

2.0 Evaluation

The recent reorganization of the nuclear operations at NPPD and CNS is the result of a management audit review that was initiated by an Order modifying NPPD's license dated August 9, 1982 issued by the Office of Inspection and Enforcement. This Order was part of a proposed Imposition of a Civil Penalty related to erroneous reporting of the status of prompt public notification system by the licensee. This audit was completed in April 1983 by LRS Consultants and has resulted in the consolidating all the nuclear operations into three divisions that report directly to the Assistant General Manager-Nuclear. The Station Superintendent's title has been changed to Nuclear Operations Division Manager and this division is one of the three divisions reporting to the Assistant General Manager. The other two divisions are the Nuclear Services and Quality Assurance Divisions. The reorganization has resulted in changes to the Operations Review Committee (SORC) and Safety Review and Audit Board (SRAB) to bring them into conformance with the new nuclear reorganization. However, the effectiveness of the review and audit functions of the SORC and SRAB would not be reduced as a result of the changes in membership in that the appropriate technical disciplines and/or consultants necessary would still be represented in the new makeup of these organizations. In addition, the SRAB would report directly to the Assistant General Manager-Nuclear since he has been designated as the NPPD Senior Nuclear Manager.

We have reviewed the recent management reorganization contained in the licensee's October 26, 1983 submittal. The management reorganization is consistent with the recommendations contained in the management appraisal report prepared by LRS for NPPD. Under this reorganization all nuclear operations and support are consolidated and report to one individual (Assistant General Manager-Nuclear). This should improve the working relationship between the corporate headquarters and the plant and the coordination of the entire nuclear effort within the organization. It is the staffs position that this recent reorganization provides a significant improvement over the old organization and is therefore acceptable.

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In addition since the changes in the membership of the SORC and SRAB resulting from the recent reorganization should not reduce the effectiveness of these organizations we find them acceptable.

The correcting of typographical errors are purely administrative in nature and therefore, are acceptable.

Therefore we have determined based on our review, that the Technical Specifications proposed by the licensee are acceptable.

3.0 Environmental Considerations

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact, and pursuant to 10 CFR Section 51.5(d)(4) that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of the amendment.

4.0 Conclusions

We have concluded, based on the considerations discussed above, that:
(1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and
(2) 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.

Principal Contributor: B. Siegel

Dated: March 20, 1984