



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

NLS2002086  
October 8, 2002

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

**Subject:** Proposed Technical Specification Amendment  
Personnel Title Revisions and Reference Correction to Technical Specification,  
Section 5.0, Administrative Controls  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

**References:** 1. Industry/TSTF Standard Technical Specification Change Traveler,  
TSTF-65, "Use of Generic Titles for Utility Positions"

The purpose of this letter is to request an amendment to the Cooper Nuclear Station (CNS) Technical Specifications. Pursuant to 10 CFR 50.90, Nebraska Public Power District (NPPD) hereby requests the following amendment to CNS Technical Specifications Section 5.0. This license amendment request (LAR) proposes to change the title of Shift Supervisor to Shift Manager. Individuals in this position have senior license responsibility for the safe operation of the station. The title of Shift Manager better conveys the corresponding level of authority this position entails. This LAR also proposes to replace plant-specific titles with generic titles consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-65, Rev. 1 (Reference 1) approved by the Nuclear Regulatory Commission on December 2, 1997. The proposed TS would change the titles of: (a) "Plant Manager" to "plant manager," (b) "Vice President - Nuclear" to "corporate officer with direct responsibility for the plant," (c) "Radiological Manager" to "radiological manager," (d) "Operations Supervisor" to "operations supervisor" and (e) "Shift Radiological Protection/Chemistry Technician" to "radiation protection technician." This proposal includes an Updated Safety Analysis Report (USAR) reference correction resulting from the USAR Rebaseline Project and a correction to the title "Shift Technical Advisor" to "Shift Technical Engineer" in TS Section 5.3.1 so as to be consistent with the title used in TS Section 5.2.2.f.

These changes do not eliminate any of the qualifications, responsibilities or requirements for these positions. The plant-specific titles will be identified in the Updated Safety Analysis Report. The changes proposed in this LAR are administrative in nature, and are not required to address an immediate safety concern.

The attached No Significant Hazards Consideration evaluation concludes that the license amendment requested herein does not represent a significant hazard because the changes do not involve a significant increase in the probability or consequences of an accident previously

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evaluated; create the possibility of a new or different kind of accident from any accident previously evaluated; or involve a significant reduction in the margin of safety.

NPPD requests approval of the proposed amendment by April 15, 2003. Once approved, the amendment shall be implemented in the affected licensing basis documents within 60 days. Necessary procedure changes have been identified. Due to the high number of procedures affected, CNS will process the changes as the procedures are updated or revised per the normal station procedure change process. The coordination and tracking of the changes will be maintained under administrative control to ensure that procedure changes are completed.

Attachment 1 contains NPPD's evaluation of the amendment. Attachment 2 contains marked up pages of the proposed changes. Attachment 3 contains the final, clean, typed version of the affected pages. Attachment 4 contains the actions that NPPD has committed to.

This proposed amendment has been reviewed by the necessary NPPD safety review committees (Station Operations Review Committee and Safety Review and Audit Board) and incorporates amendments to the CNS Technical Specifications through Amendment 194. By copy of this letter and its attachments, the appropriate State of Nebraska official is 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)(1).

Should you have any questions concerning this matter, please contact Mr. Paul Fleming at (402) 825-2774.

Sincerely,



David L. Wilson  
Vice President - Nuclear

/dwv

Attachments

cc:	Regional Administrator w/ attachments USNRC - Region IV	Senior Resident Inspector w/ attachments USNRC
	Senior Project Manager w/ attachments USNRC - NRR Project Directorate IV-1	NPG Distribution w/o attachments
	Nebraska Health and Human Services Department of Regulation and Licensure w/attachments	Records w/ attachments



## **NPPD's Evaluation**

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## **Title**

Revision to Technical Specification, Section 5.0

## **Revised Pages**

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### **1.0 Introduction**

This letter is a request to amend the Technical Specifications (TS) for Cooper Nuclear Station. The proposed change will revise Cooper Nuclear Station (CNS) Technical Specification 5.0. This amendment proposes to change the title of Shift Supervisor to Shift Manager. Individuals in this position have senior license responsibility for the safe operation of the station. Therefore, the title of Shift Manager better conveys the corresponding level of authority this position entails. This proposal will replace plant-specific titles with generic titles consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-65, Rev. 1, approved by the NRC on December 2, 1997. This proposal also includes a Updated Safety Analysis Report (USAR) reference correction resulting from the USAR Rebaseline Project and a correction to the title of Shift Technical Advisor.

### **2.0 Description of Proposed Amendment**

This license amendment request (LAR) proposes the following changes:

1. TS 5.1.1 would be revised to replace the title "Plant Manager" with the generic title "plant manager."
2. TS 5.1.2 would be revised to replace the title "Shift Supervisor" with "Shift Manager" and the acronym "SS" with "SM."
3. TS 5.2.1.a, last sentence, would be revised to state: "These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the USAR."
4. TS 5.2.1.b would be revised to replace the title "Plant Manager" with the generic title "plant manager."

5. TS 5.2.1.c would be revised to replace the title "Vice President - Nuclear" with the generic title "corporate officer with direct responsibility for the plant."
6. TS 5.2.2.d would be revised to replace the title "Shift Radiological Protection/Chemistry Technician" with the generic title "radiation protection technician."
7. TS 5.2.2.e would be revised to replace the title "Operations Supervisor" with the generic title "operations supervisor."
8. TS 5.2.2.f would be revised to replace the title "Shift Supervisor" with "Shift Manager" and the acronym "SS" with "SM."
9. TS 5.3.1 would be revised to replace the title "Shift Supervisor" with "Shift Manager," "Shift Technical Advisor" with "Shift Technical Engineer" and "Radiological Manager" with the generic title "radiological manager."
10. TS 5.5.1.c.2 would be revised to replace the title "Plant Manager" with the generic title "plant manager."
11. TS 5.5.5 would be revised to replace "USAR Section III-3.4" with the correct reference "USAR Section III-3.5."

The proposed changes are strictly administrative in nature and have no adverse safety implications as the qualifications, responsibilities or requirements of the positions are unchanged.

### **3.0 Background**

The proposal to change the Shift Supervisor title to Shift Manger resulted from Institute of Nuclear Power Operations (INPO) recommendations in Significant Operating Experience Report 96-1 to provide Shift Supervisors with a title that better conveys the corresponding level of authority this position entails. This LAR also proposes to revise TS 5.0 to replace plant-specific titles with lowercase generic titles consistent with TSTF-65, Use of Generic Titles for Utility Positions.

These changes do not eliminate any of the qualifications, responsibilities or requirements of these positions. Members of the plant staff assigned to these positions shall continue to meet or exceed the minimum qualifications of American National Standards Institute N-18.1-1971 or Regulatory Guide 1.8, Revision 2, April 1987, as required by TS 5.3.1. The plant-specific titles for these TS positions will be identified in the USAR.

This license amendment will also correct a USAR reference error and correct the title of "Shift Technical Advisor" in TS 5.3.1 to "Shift Technical Engineer." The USAR

reference error was created by the USAR Rebaseline project when sections of the USAR were renumbered. The title, "Shift Technical Engineer," was used in TS Section 5.2.2.f in the conversion to Standard Technical Specifications, Amendment 178 to the Cooper TS. Amendment 181 to the CNS TS, dated March 27, 2000, unintentionally used the title "Shift Technical Advisor" when addressing staff qualifications in TS Section 5.3.1. This change will provide consistency between TS Sections 5.2.2.f and 5.3.1.

#### **4.0 Regulatory Requirements and Guidance**

The proposed changes to TS Sections 5.1.2, 5.2.2.f, 5.3.1 and 5.5.5 are strictly administrative in nature and as such do not have associated regulatory requirements or guidance. Proposed changes to TS 5.1.1, 5.2.1.a, 5.2.1.b, 5.2.1.c, 5.2.2.d, 5.2.2.e, 5.3.1, and 5.5.1.c.2 are also administrative in nature but have been previously reviewed and approved by the NRC via TSTF-65, Rev. 1. TSTF-65 allows for use of generic titles in Technical Specifications Section 5.0, "Administrative Controls."

#### **5.0 Technical Analysis**

The TS 5.0 changes proposed by this LAR are title changes and corrections only and do not affect the technical requirements of the TS. As such, the changes are administrative only, and have no impact on plant safety systems or design basis accidents. No plant equipment is being changed, and no methods of plant operation or plant maintenance are being changed. The only changes to procedures for plant operation or plant maintenance that will result from the proposed changes will be administrative in nature, to reflect new position titles.

Individuals in the position of Shift Supervisor have senior license responsibility for the safe operation of CNS and as such, the title of Shift Manager better conveys the corresponding level of authority this position entails. The proposed title change does not have any safety implications as the qualifications, training, duties and experience requirements of the position are unchanged.

TSTF-65 allows for use of generic personnel titles in-lieu of plant-specific titles. This TSTF is applicable to CNS and was approved by the NRC on December 2, 1997. The proposed title changes do not have any safety implications as the qualifications, training, duties and experience requirements of the position are unchanged.

As part of the USAR Rebaseline project at CNS, sections of the USAR were renumbered. This caused the reference in TS Section 5.5.5 to be incorrect. This proposed change is strictly administrative to ensure the correct reference is used in the CNS TS.

Implementation of Amendment 181, approved by the NRC on March 15, 2000, unintentionally added the wrong title for the Shift Technical Engineer. This proposed change is strictly administrative to ensure titles are used consistently throughout TS.

## **6.0 Regulatory Analysis**

The proposed changes to TS Sections 5.1.2, 5.2.2.f, and 5.3.1 are strictly administrative in nature and as such do not have any adverse safety implications. Individuals in the Shift Supervisor position have senior license responsibility for the safe operation of CNS and as such, the title of Shift Manager better conveys the corresponding level of authority this position entails. Standard Technical Specifications has this title bracketed indicating this is not a specific title.

TSTF-65 allows for use of generic personnel titles in-lieu of plant-specific titles. This TSTF is applicable to CNS and was approved by the NRC on December 2, 1997. The proposed changes will affect TS Sections 5.1.1, 5.2.1.a, 5.2.1.b, 5.2.1.c, 5.2.2.d, 5.2.2.e, 5.3.1 and 5.5.1.c.2. The use of generic titles does not change the qualification requirements or the duties performed by those positions.

Section 5.5.5 incorrectly references section III-3.4 of the Cooper USAR. The USAR Rebaseline Project, conducted, in part to develop consistency in numbering of USAR sections, revised the appropriate section from III-3.4 to III-3.5. Thus, the correct reference to the USAR in TS Section 5.5.5 is "USAR Section III-3.5."

The title "Shift Technical Engineer" was added to TS Section 5.2.2.f during the conversion to Standard Technical Specifications in Amendment 178 dated July 31, 1998. CNS TS Amendment 181, dated March 15, 2000, added requirements that Shift Supervisor, Senior Operator, Licensed Operator, Shift Technical Advisor, and Radiological Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2. The title "Shift Technical Advisor" was unintentionally used in place of the correct title "Shift Technical Engineer."

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be adverse to the common defense and security or to the health and safety of the public.

## **7.0 No Significant Hazards Consideration**

10 CFR 50.91(a)(1) requires that licensee requests for operating license amendments be accompanied by an evaluation of any significant hazard posed by issuance of the requested amendment. NPPD has evaluated the amendment proposed therein with respect to the criteria in 10 CFR 50.92(c).

**1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?**

The title of Shift Manager better conveys the appropriate level of responsibility and authority required of the position. The use of generic personnel titles and correction of the USAR reference are strictly administrative. The qualifications, training, duties and experience required of the individuals remain unchanged. The USAR section to be referenced is physically the same section that was referenced before the USAR renumbering. The requested changes do not involve any change to the design basis of the plant or any structure, system, or component. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

**2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?**

There will be no physical alterations to the plant configuration. No changes in operating mode or limits are proposed. The qualifications, training, duties and experience required of the individuals remain unchanged. The USAR section to be referenced is physically the same section that was referenced before the USAR renumbering. Therefore, these proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

**3. Do the proposed changes involve a significant reduction in the margin of safety?**

The proposed change in titles and USAR reference are strictly administrative. The qualifications, training, duties and experience required of the individuals remain unchanged. The USAR section to be referenced is physically the same section that was referenced before the USAR renumbering. The proposed changes do not change any license condition or Technical Specifications safety limit or limiting condition for operation. The changes do not involve modification of the design or operation of any plant system involved with controlling the release of radioactivity to the environment. Therefore, these changes do not involve a significant reduction in a margin of safety.

Based on the above, Nebraska Public Power District concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

## **8.0 Environmental Consideration**

10 CFR 51.22(c)(9) provides criteria for, and identification of, licensing and regulatory actions eligible for categorical exclusion from the requirements to perform an environmental assessment. A proposed amendment to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amount of any effluents that may be released off-site, or (3) result in an increase in individual or cumulative occupational radiation exposure. NPPD has reviewed the proposed license amendment and concludes that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(c), no environmental impact statement or environmental assessment needs to be prepared in connection with issuance of the proposed license changes. The basis for this determination is as follows:

1. The proposed license amendment does not involve a significant hazards consideration as described previously in the No Significant Hazards Consideration evaluation.
2. The proposed change does not result in a significant increase in the types or amounts of any effluents that may be released off-site. The proposed license amendment does not introduce any new equipment, and does not require any existing equipment or systems to perform a different type of function. NPPD has concluded that there will not be a significant increase in the types or amounts of any effluents that may be released off-site and these changes do not involve irreversible environmental consequences beyond those already associated with normal operation.
3. These changes do not adversely affect plant systems or operation and, therefore, do not significantly increase individual or cumulative occupational radiation exposure beyond that already associated with normal operation.

## **9.0 Precedents**

For your convenience in reviewing this amendment, below is a list of other facilities that have been granted approval of similar amendments:

1. Diablo Canyon Nuclear Power Plant, Docket No. 50-275, SER for Amendment No. 146 to DPR-80. (TSTF-65)
2. Sequoyah Nuclear Facility, Docket No. 50-327, SER for Amendment No. 266 to DPR-77. (Shift Manager title)
3. Fort Calhoun Station, Docket No. 50-285, SER for Amendment 190 to DPR-40. (Shift Manager title)

## 10.0 References

1. American National Standards Institute N-18.1-1971, Selection and Training of Nuclear Power Plant Personnel
2. Regulatory Guide 1.8, Revision 2, Qualification and Training of Personnel for Nuclear Power Plants
3. NRC letter dated July 31, 1998, from Jack N. Donohew, USNRC, to G. R. Horn, Nebraska Public Power District, issuing Amendment No. 178 to License DPR-46, Conversion to Improved Technical Specifications (TAC No. M98317)
4. NRC letter dated March 15, 2000, from Lawrence J. Burkhart, USNRC, to J. H. Swailes, Nebraska Public Power District, issuing Amendment No. 181 to License DPR-46, Issuance of Amendment on Unit Staff Qualifications (TAC No. MA5139)

**Markup of  
Technical Specification Pages**

Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Revised Technical Specification Pages

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The Pplant Mmanager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The Pplant Mmanager or his designee shall approve, prior to implementation, each proposed test, experiment, and modification to systems or equipment that affect nuclear safety.

- 5.1.2 The Shift ~~Supervisor (SS)~~Manager (SM) shall be responsible for the control room command function. During any absence of the ~~SSSM~~ from the control room while the unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the ~~SSSM~~ from the control room while the unit is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the USAR.
- b. The Pplant Mmanager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The ~~Vice President~~ Nuclear corporate officer with direct responsibility for the plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff, carry out radiological protection functions, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned when the reactor contains fuel and two additional non-licensed operators shall be assigned when the reactor is operating in MODES 1, 2, or 3.

## 5.2 Organization

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### 5.2.2 Unit Staff (continued)

- b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.
  - c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specification 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
  - d. A ~~Shift Radiological Protection/Chemistry~~ radiation protection Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
  - e. The ~~Operations~~ Supervisor shall hold an SRO license.
  - f. The Shift Technical Engineer (STE) shall provide advisory technical support to the ~~Shift Supervisor (SS)~~ Manager (SM) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit when the unit is in MODE 1, 2, or 3. In addition, the STE shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
  - g. Written administrative procedures for shift overtime shall be established, implemented, and maintained.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

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- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of the American National Standards Institute N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants," except for the Shift Supervisor/Manager, Senior Operator, Licensed Operator, Shift Technical Advisor/Engineer, and Radiological Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs shall be established, implemented and maintained.

#### 5.5.1 Offsite Dose Assessment Manual (ODAM)

- a. The ODA M shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODA M shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release reports required by Specification 5.6.2 and Specification 5.6.3.
- c. Licensee initiated changes to the ODA M:
  1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
    - a. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
    - b. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
  2. Shall become effective after review and acceptance by the Station Operations Review Committee (SORC) and the approval of the Pplant Mmanager; and
  3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODA M as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODA M was made. Each change shall be identified by

## 5.5 Programs and Manuals

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### 5.5.4 Radioactive Effluent Controls Program (continued)

- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary shall be limited to the following:
  - 1. For noble gases: less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
  - 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

### 5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the USAR Section III-3.45, cyclic and transient occurrences to ensure that components are maintained within the design limits.

**Retyped  
Technical Specification Pages**

Cooper Nuclear Station, NRC Docket 50-298, DPR-46

Proposed Technical Specification Pages

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.1 Responsibility

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- 5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment, and modification to systems or equipment that affect nuclear safety.

- 5.1.2 The Shift Manager (SM) shall be responsible for the control room command function. During any absence of the SM from the control room while the unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SM from the control room while the unit is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the USAR.
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The corporate officer with direct responsibility for the plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff, carry out radiological protection functions, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned when the reactor contains fuel and two additional non-licensed operators shall be assigned when the reactor is operating in MODES 1, 2, or 3.

## 5.2 Organization

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### 5.2.2 Unit Staff (continued)

- b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.
  - c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specification 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
  - d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
  - e. The operations supervisor shall hold an SRO license.
  - f. The Shift Technical Engineer (STE) shall provide advisory technical support to the Shift Manager (SM) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit when the unit is in MODE 1, 2, or 3. In addition, the STE shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
  - g. Written administrative procedures for shift overtime shall be established, implemented, and maintained.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.3 Unit Staff Qualifications

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- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of the American National Standards Institute N-18.1-1971, "Selection and Training of Personnel for Nuclear Power Plants," except for the Shift Manager, Senior Operator, Licensed Operator, Shift Technical Engineer, and radiological manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2.
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## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Programs and Manuals

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The following programs shall be established, implemented and maintained.

#### 5.5.1 Offsite Dose Assessment Manual (ODAM)

- a. The ODA M shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODA M shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release reports required by Specification 5.6.2 and Specification 5.6.3.
- c. Licensee initiated changes to the ODA M:
  1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
    - a. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
    - b. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
  2. Shall become effective after review and acceptance by the Station Operations Review Committee (SORC) and the approval of the plant manager; and
  3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODA M as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODA M was made. Each change shall be identified by

## 5.5 Programs and Manuals

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### 5.5.4 Radioactive Effluent Controls Program (continued)

- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary shall be limited to the following:
  - 1. For noble gases: less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
  - 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

### 5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the USAR Section III-3.5, cyclic and transient occurrences to ensure that components are maintained within the design limits.

## **Commitments**

ATTACHMENT 3      LIST OF REGULATORY COMMITMENTS
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Correspondence Number NLS2002086

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only 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.

COMMITMENT	COMMITTED DATE OR OUTAGE
The plant-specific titles will be identified in the USAR.	60 days from approval of the amendment.
The coordination and tracking of the procedure change implementation will be maintained under administrative control to ensure that procedure changes are completed as they are updated or revised per the normal station procedure change process.	N/A
Revise the Safeguards Plan, Emergency Plan, Updated Safety Analysis Report and Quality Assurance Policy Document to reflect the new title of Shift Manager.	60 days from approval of the amendment.