

November 25, 2002

MEMORANDUM TO: Robert A. Gramm
Project Directorate IV-1
Division of Licensing Project Management
/RA/

FROM: Dale F. Thatcher, Chief
Quality and Maintenance Section
Equipment and Human Performance Branch

SUBJECT: REVISION TO TECHNICAL SPECIFICATION SECTION 5.0,
"ADMINISTRATIVE CONTROLS" (R.E. COOPER NUCLEAR
STATION), MB6548

By letter dated October 8, 2002, Nebraska Public Power District submitted a revision request to the Technical Specifications for the Cooper Nuclear Station in accordance with the provisions of 10 CFR 50.90. Pursuant to 50.90, the licensee identified changes that constitute a reduction in commitment and, therefore, requires NRC approval prior to implementation. These changes replace plant-specific titles with generic titles and change the title of Shift Supervisor to Shift Manager. This proposal also includes an Updated Safety Analysis Report (USAR) reference correction resulting from the USAR Rebaseline Project and a correction to the title of Shift Technical Advisor.

Our review and bases for finding the proposed changes to be acceptable are documented in the attached safety evaluation. The reductions in commitments continue to satisfy the standards and regulations, and are therefore, acceptable.

Any questions related to our review should be directed to Paul Prescott at 415-3026. This closes our actions on the subject TAC No.

Attachment: As stated

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Accession Number: ML023240337

OFFICE	IEHB:DIPM	SC:IEHB:DIPM	
NAME	PPrescott	DFThatcher	
DATE	11/25/02	11/25/02	/ /02

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November XX, 2002

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT 194 TO FACILITY OPERATING LICENSE NO. DPR-46
NEBRASKA PUBLIC POWER DISTRICT
COOPER NUCLEAR STATION

1. Introduction

By letter dated October 8, 2002, Nebraska Public Power District (NPPD, the licensee) requested changes to the Cooper Nuclear Station (CNS) Technical Specifications (TS). The proposed changes revise TS Section 5.0, "Administrative Controls," to change the title of Shift Supervisor to Shift Manager and replace plant-specific titles with generic titles. This proposal also includes an Updated Safety Analysis Report (USAR) reference correction resulting from the USAR Rebaseline Project and a correction to the title of Shift Technical Advisor.

2. Evaluation

The NRC approved a generic change in Technical Specification Task Force (TSTF)-65, to revise Section 5.0, "Administrative Controls," which allowed the use of the lower case generic personnel titles in lieu of plant-specific titles. The justification for the approved change was based on the fact that it does not eliminate any of the qualifications, responsibilities or requirements for these positions, since the plant-specific personnel titles are currently identified in licensee-controlled documents such as the USAR or the Quality Assurance Plan.

In its application, NPPD proposed to modify TS Section 5.0. "Administrative Controls," in TS 5.1.1, TS 5.1.2, TS 5.2.1.a, TS 5.2.1.b, TS 5.2.1.c, TS 5.2.2.d, TS 5.2.2.e, TS 5.2.2.f, TS 5.3.1, TS 5.5.1.c.2 and TS 5.5.5 as follows:

The 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 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 "Shift Supervisor" with "Shift Manager" and the acronym "SS" with "SM."
9. TS5.3.1 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 staff's review finds that the above proposed modifications of the TS Section 5.0, "Administrative Controls," are consistent with the NRC-approved TSTF-65, as discussed above. The staff also finds this to be acceptable because these changes do not affect the qualification requirements in the Technical Specifications. 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.

Therefore, the staff finds that this amendment request is acceptable.

3. Conclusion

The proposed title changes are acceptable in that the title changes do not eliminate any of the qualifications, responsibilities or requirements for these positions.