

March 3, 2004

Mr. Randall K. Edington  
Vice President-Nuclear and CNO  
Nebraska Public Power District  
P. O. Box 98  
Brownville, NE 68321

SUBJECT: COOPER NUCLEAR STATION - APPROVAL OF EMERGENCY PLAN  
CHANGE RE: REMOVAL OF ANALOG STRIP CHART RECORDERS  
(TAC NO. MC0953)

Dear Mr. Edington:

In response to your letter dated September 4, 2003, the Nuclear Regulatory Commission (NRC) staff has issued the enclosed safety evaluation (SE) for the Cooper Nuclear Station (CNS). The SE contains the basis for the NRC-staff approval of the proposed changes to the Emergency Plan regarding the recording and storing of meteorological monitoring data.

The NRC staff has reviewed the change to the CNS Emergency Plan and supporting documentation in the attachment to the letter dated September 4, 2003, and concluded that the change meets the standards of Section 50.47(b) of Title 10 of the *Code of Federal Regulations* (10 CFR) and the requirements of Appendix E to 10 CFR Part 50. Therefore, the proposed CNS Emergency Plan change is approved.

Sincerely,

*/RA/*

Michelle C. Honcharik, Project Manager, Section 1  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosure: As stated

cc w/encl: See next page

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\*No substantive changes

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO EMERGENCY PLAN CHANGES

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

1.0 INTRODUCTION

By letter dated September 4, 2003, (ML032521419) Nebraska Public Power District (the licensee), requested Nuclear Regulatory Commission (NRC) approval of changes to the Emergency Plan for Cooper Nuclear Station (CNS). The proposed changes would revise the Emergency Plan regarding the recording and storing of meteorological monitoring data.

2.0 REGULATORY EVALUATION

The NRC staff finds that the licensee in the attachment to its submittal identified the applicable regulatory requirements. The regulatory requirements and guidance for which the staff based its acceptance are as follows:

2.1 Regulatory Requirements

- As stated in part in Section 50.54(q) of Title 10 of the *Code of Federal Regulations* (10 CFR), "A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in [10 CFR] 50.47(b) and the requirements in [A]ppendix E to [10 CFR Part 50] ... The nuclear power reactor licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of [10 CFR] 50.47(b) and the requirements of [A]ppendix E [in 10 CFR Part 50] ... Proposed changes that decrease the effectiveness of the approved emergency plans may not be implemented without application to and approval by the Commission."
- The regulation at 10 CFR 50.47(b)(9) states that "Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use."
- Section E.2 of Appendix E to 10 CFR Part 50 states, in part, that emergency equipment shall include "[e]quipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment."

Enclosure

## 2.2 Regulatory Guidance

- Regulatory Guide (RG) 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 4, states, in part, that the criteria and recommendations contained in Revision 1 of NUREG-0654/FEMA [Federal Emergency Management Agency]-REP-1, "Criteria for Preparation and Evaluation of Radiological Response Plans and Preparedness in Support of Nuclear Power Plants," are considered by the NRC staff to be acceptable methods for complying with the standards in 10 CFR 50.47 that must be met in on-site and off-site emergency response plans.
- Planning Standard I.5, "Accident Assessment," contained in NUREG-0654/FEMA-REP-1, states, in part, that each licensee shall have a capability for acquiring and evaluating meteorological information sufficient to meet the criteria of Appendix 2 of NUREG-0654/FEMA-REP-1. Appendix 2 of NUREG-0654/FEMA-REP-1, "Meteorological Criteria for Emergency Preparedness at Operating Nuclear Power Plants," states, in part, that to address the requirements in Section E.2 of Appendix E to 10 CFR Part 50, the nuclear power plant operator shall have primary and backup meteorological measurement systems. The guidance in Appendix 2 also states that the acceptance criteria for primary and back up meteorological measurement systems are described in the Proposed Revision 1 to RG 1.23, "Onsite Meteorological Programs."

## 3.0 TECHNICAL EVALUATION

In the September 4, 2003, submittal, the licensee states that over time the strip chart recorders that displayed meteorological monitoring data became obsolete, and in some cases, became non-functional due to the lack of available replacement parts, and were not operating consistently in a reliable manner. Also the design of the digital Plant Management Information System (PMIS) has been upgraded over time so that it currently consists of a primary and identical redundant backup system with an automatic transfer function to the backup unit if the primary unit fails. Each day's data is extracted from PMIS and archived. The PMIS computers (primary and backup) function continuously for data acquisition and storage and provide a capability for redundant digital recording/storage of the meteorological data. The licensee further states that the archiving capability associated with the PMIS computers provides sufficient capacity for storage of meteorological data. The PMIS system meets the redundancy and reliability requirements of the Proposed Revision 1 to RG 1.23 by providing a primary and backup system for the retrieval and storage of meteorological data. In addition, the strip chart recorder data was provided in the computer room adjacent to the Control Room whereas the PMIS data is directly available in the Control Room.

Therefore, the NRC staff finds that the replacement of the analog strip recorders with the redundant meteorological data storage and retrieval capabilities of the PMIS system meets the intent of Proposed Revision 1 to RG 1.23, Section C.3, and provides an acceptable basis for the CNS Emergency Plan change. Also, changing the availability of meteorological data to the Control Room meets the intent of Proposed Revision 1 to RG 1.23, Section C.3, and is therefore, acceptable.

The meteorological monitoring systems described in Proposed Revision 1 to RG 1.23 are intended to provide the meteorological information required to make a number of assessments, including the estimation of potential doses to the public as a result of an accidental release of

radioactive materials to the atmosphere. The NRC staff's finding of the acceptability of the CNS Emergency Plan changes described in this safety evaluation is only applicable to the meteorological monitoring system as it relates to the estimation of potential doses to the public and does not constitute approval for any other assessments described in Proposed Revision 1 to RG 1.23.

#### 4.0 CONCLUSION

The NRC staff has determined that the changes to the CNS Emergency Plan described above are acceptable and comply with the applicable portions of 10 CFR 50.47(b)(9) and Section E.2 of Appendix E to 10 CFR Part 50. Therefore, the Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Moody

Date: March 4, 2004

Cooper Nuclear Station

cc:

Mr. William J. Fehrman  
President and Chief Executive Officer  
Nebraska Public Power District  
1414 15<sup>th</sup> Street  
Columbus, NE 68601

Mr. Clay C. Warren  
Vice President - Nuclear  
Nebraska Public Power District  
P. O. Box 98  
Brownville, NE 68321

Mr. John R. McPhail, General Counsel  
Nebraska Public Power District  
P. O. Box 499  
Columbus, NE 68602-0499

Mr. Paul V. Fleming, Licensing and  
Regulatory Affairs Manager  
Nebraska Public Power District  
P.O. Box 98  
Brownville, NE 68321

Mr. Michael J. Linder, Director  
Nebraska Department of Environmental  
Quality  
P. O. Box 98922  
Lincoln, NE 68509-8922

Chairman  
Nemaha County Board of Commissioners  
Nemaha County Courthouse  
1824 N Street  
Auburn, NE 68305

Ms. Cheryl K. Rogers, Program Manager  
Nebraska Health & Human Services  
System  
Division of Public Health Assurance  
Consumer Services Section  
301 Centennial Mall, South  
P. O. Box 95007  
Lincoln, NE 68509-5007

Mr. Ronald A. Kucera, Director  
of Intergovernmental Cooperation  
Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 218  
Brownville, NE 68321

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Jerry Uhlmann, Director  
State Emergency Management Agency  
P. O. Box 116  
Jefferson City, MO 65101

Chief, Radiation and Asbestos  
Control Section  
Kansas Department of Health  
and Environment  
Bureau of Air and Radiation  
1000 SW Jackson  
Suite 310  
Topeka, KS 66612-1366

Mr. Daniel K. McGhee  
Bureau of Radiological Health  
Iowa Department of Public Health  
401 SW 7<sup>th</sup> Street  
Suite D  
Des Moines, IA 50309

Mr. Scott Clardy, Director  
Section for Environmental Public Health  
P.O. Box 570  
Jefferson City, MO 65102-0570