

**TREAT AS  
SENSITIVE  
INFORMATION**



**Nebraska Public Power District**

*Always there when you need us*

50.54(q)

NLS2005006  
January 28, 2005

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

Subject: Change to Emergency Plan Implementing Procedure  
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

The purpose of this letter is to request approval of a change to the Cooper Nuclear Station (CNS) Emergency Plan Implementing Procedure 5.7.1 in accordance with the requirements of 10 CFR 50.54(q). The change page is provided in the enclosure to this letter. The change involves deleting the example in Emergency Action Level (EAL) 1.1.2 of "MPF BLDG VENT HI-HI RAD" and removing the statement, "The MPF is not calculated in the Combined Effluent Monitor display" from the memo field. The text for the EAL and the CNS Emergency Plan are not modified by this change.

The Multi-Purpose Facility (MPF) at CNS houses decontamination and support equipment used in the maintenance and repair of plant components. Hot machine shop activities are also performed in this facility. The MPF Ventilation Radiation Monitoring System monitors any gaseous releases from the MPF to the atmosphere.

The existing Kaman monitor (RV-RM-10), located on the mezzanine level of the MPF, provides effluent monitoring for activities in the facility. Particulates, iodine and noble gases are monitored. The monitor has been experiencing operational problems due to obsolete equipment and associated spare parts being no longer available.

A pending design change will replace the current system with redundant continuous air monitors (CAM) that will continue to monitor particulate and iodine but not noble gases. Noble gases cannot be generated by any activities within the MPF nor are there any sources that pass through the MPF area that would discharge into the area as the result of an accident. There are no plans to add such a source to the MPF area. The new CAM will provide increased reliability.

The modification is consistent with the effluent monitoring requirements of the CNS Offsite Dose Assessment Manual (ODAM). Table D 3.3.2-1, "Radioactive Gaseous Effluent Monitoring Instrumentation," of that manual does not require a noble gas activity monitor for the MPF. ODA Table 3-1, "Atmospheric Gaseous Release Points at the Cooper Nuclear Generating Station," does not include the MPF as a gaseous effluent release pathway.

AX45

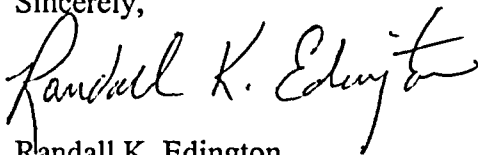
The proposed change does not impact the CNS Emergency Plan. Section 4.2 lists the monitored release pathways for off-site radiological assessment as the Elevated Release Point, Turbine Building Vent, Reactor Building Vent and Radwaste/Augmented Radwaste Building Vents. The MPF building vent is not included in the CNS Dose Assessment program and is not a post-accident monitored release point.

The MPF Ventilation Radiation Monitoring System does not directly interface with any systems, structures or components that are accident initiators or credited with mitigation of any accidents described in Chapter XIV of the Updated Safety Analysis Report. The MPF monitor has no control function.

This change is evaluated as a decrease in effectiveness because it excludes an event that is currently classified as a Notification of Unusual Event. The proposed change will not adversely affect the design basis functions of the MPF Ventilation Radiation Monitoring System or the station's ability to meet ODAM requirements. The proposed change does not adversely affect the health and safety of the public as the MPF is not considered a release pathway for noble gas effluents. The states of Nebraska and Missouri are in agreement with this change. The station's on-site and off-site review committees have approved the change.

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

Sincerely,



Randall K. Edington  
Vice President - Nuclear and  
Chief Nuclear Officer

/jrs  
Enclosure

cc: Regional Administrator w/enclosure  
USNRC - Region IV

Senior Project Manager w/enclosure  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/enclosure  
USNRC

NPG Distribution w/o enclosure

Enclosure 1  
to NLS2005006  
Page 1 of 3

CHANGE PAGE TO ATTACHMENT 2 OF PROCEDURE 5.7.1

CLASSIFICATION

EAL: 1.1.2

NOUE

TEXT

Off-Site Dose Assessment Manual (ODAM) limits exceeded as indicated by either HIGH-HIGH alarm on a gaseous effluent radiological monitor OR Combined Effluent Monitor indication on SPDS which cannot be cleared within 30 minutes.

APPLICABILITY

ALL

EXAMPLE

Any one of the following annunciators/SPDS indications is received AND release is verified, but not brought below ODA M limits within 30 minutes:

- RX BLDG VENT HI-HI RAD.
- ERP DISCHARGE HI-HI RAD.
- TG BLDG VENT HI-HI RAD.
- RW/ARW VENT HI-HI RAD.
- ~~• MPF BLDG VENT HI-HI RAD.~~
- Combined Effluent Monitors on SPDS exceeding ODA M limit.

MEMO

Alarms should be validated prior to making classification. If any valid alarm cannot be cleared within 30 minutes, the EAL is met.

The Combined Effluent Monitor on SPDS is a sum of the fractions of the release rate/ODA M limit for the Reactor Building, Elevated Release Point, Turbine Building, and Rad Waste/Augmented Rad Waste Buildings. It is possible for it to be in alarm with no single point at the HI-HI alarm setpoint. ~~The MPF is not calculated in the Combined Effluent Monitor display.~~

REFERENCES

NUREG-0654: N.02

CLASSIFICATION

EAL: 1.1.2

NOUE

TEXT

Off-Site Dose Assessment Manual (ODAM) limits exceeded as indicated by either HIGH-HIGH alarm on a gaseous effluent radiological monitor OR Combined Effluent Monitor indication on SPDS which cannot be cleared within 30 minutes.

APPLICABILITY

ALL

EXAMPLE

Any one of the following annunciators/SPDS indications is received AND release is verified, but not brought below ODA limits within 30 minutes:

- RX BLDG VENT HI-HI RAD.
- ERP DISCHARGE HI-HI RAD.
- TG BLDG VENT HI-HI RAD.
- RW/ARW VENT HI-HI RAD.
- Combined Effluent Monitors on SPDS exceeding ODA limit.

MEMO

Alarms should be validated prior to making classification. If any valid alarm cannot be cleared within 30 minutes, the EAL is met.

The Combined Effluent Monitor on SPDS is a sum of the fractions of the release rate/ODA limit for the Reactor Building, Elevated Release Point, Turbine Building, and Rad Waste/Augmented Rad Waste Buildings. It is possible for it to be in alarm with no single point at the HI-HI alarm setpoint.

REFERENCES

NUREG-0654: N.02

ATTACHMENT 3 LIST OF NRC COMMITMENTS
--------------------------------------

Correspondence No: NLS2005006

The following table identifies those actions committed to by the Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the Nuclear Regulatory Commission's (NRC) for the NRC's information and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
None	