

June 7, 2005

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

SUBJECT: COOPER NUCLEAR STATION - REQUEST FOR ADDITIONAL INFORMATION
RE: LICENSE AMENDMENT REQUEST TO REVISE THE REQUIRED
CHANNELS PER TRIP SYSTEM FOR PRIMARY AND SECONDARY
CONTAINMENT ISOLATION AND CONTROL ROOM EMERGENCY FILTER
SYSTEM INSTRUMENTATION (TAC NO. MC5031)

Dear Mr. Edington:

By letter dated October 25, 2004, Nebraska Public Power District (NPPD) requested the Nuclear Regulatory Commission (NRC) staff's approval for an amendment to revise the Cooper Nuclear Station Technical Specifications regarding the required channels per trip system for primary and secondary containment isolation and control room emergency filter system instrumentation.

The NRC staff has reviewed the information provided in the October 25, 2004, submittal and has determined that the additional information identified in the enclosure is required in order for the NRC staff to complete its review. As agreed upon with David Van Der Kamp on May 20, 2005, NPPD will respond to the request for additional information (RAI) within 45 days from the date of this letter. The RAI is enclosed.

Sincerely,

/RA by M. Fields for/

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: RAI

cc w/encl: See next page

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SUBJECT: COOPER NUCLEAR STATION - REQUEST FOR ADDITIONAL INFORMATION
RE: LICENSE AMENDMENT REQUEST TO REVISE THE REQUIRED CHANNELS PER TRIP SYSTEM FOR PRIMARY AND SECONDARY CONTAINMENT ISOLATION AND CONTROL ROOM EMERGENCY FILTER SYSTEM INSTRUMENTATION (TAC NO. MC5031)

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/RA by M. Fields for/
Michelle C. Honcharik, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
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REQUEST FOR ADDITIONAL INFORMATION

ISSUES RELATED TO REVISION OF TECHNICAL SPECIFICATIONS TO REVISE THE

REQUIRED CHANNELS PER TRIP SYSTEM FOR PRIMARY AND SECONDARY

CONTAINMENT ISOLATION AND CONTROL ROOM EMERGENCY FILTER SYSTEM

INSTRUMENTATION

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

1. In the October 25, 2004 submittal, the markup of the technical specification (TS) Table 3.3.6.1-1 showed Functions 2a, 5d, and 6b, Table 3.3.6.2-1 Function 1, and Table 3.3.7.1-1 Function 1 as Reactor Vessel Water Level - Low (Level 3). However, in Amendment 209 Table 3.3.6.1-1 Function 5d, Table 3.3.6.2-1 Function 1, and Table 3.3.7.1-1 Function 1 are shown to be Reactor Vessel Water Level - Low Low (Level 2).

Please explain this discrepancy between Amendment 209 and the October 25, 2004 submittal.

2. The October 25, 2004 submittal stated, "As a result of the ITS [improved technical specification] conversion the number of Required Channels Per Trip System was changed from 2 to 4. This change was based on an ITS convention that defined each divisional logic to be one trip system. Since all four instrument channels provided input signals in that divisional/trip system logic, the result was that there be 4 Required Channels Per Trip System. However, the CNS [Cooper Nuclear Station] design basis defines each divisional logic as having two trip systems, thus 2 Required Channels Per Trip System. The discussion of changes submitted with the ITS revisions acknowledged the change in practice that was introduced."
 - (a) Please provide more details concerning how this change was introduced during the ITS conversion.
 - (b) Please identify the pages of the ITS submittal where the discussion of changes, that acknowledged the change in practice, appeared.
 - (c) What was the construction of the TS for these instruments prior to the conversion to the ITS format? How many channels, what were the action statements, etc.
3. In the October 25, 2004 submittal, the markup of page B 3.3-157, Function 6.b, second paragraph, second sentence, reads, "~~Eight~~ Four channels (four channels per trip

system) of the Reactor Vessel Water Level - Low (Level 3) Function are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function."

If there are four channels total, is "(four channels per trip system)" correct?

4. Some of the instruments involved in this request also appear in other TS tables with the Required Number of Channels Per Trip System being different from the number of channels in your request. Reactor Vessel Water Level - Low Low (Level 2) appears in Table 3.3.5.1-1, "Emergency Core Cooling System Instrumentation," Function 3a and Table 3.3.5.2-1, "Reactor Core Isolation Cooling System Instrumentation," Function 1, with 4 as the Required Channels Per Trip System. Drywell Pressure - High appears in Table 3.3.5.1-1 Functions 1b, 2b, and 3b, with 4 as the Required Channels Per Trip System.

Please explain why your request does not agree with the Required Channels Per Trip System in TS Tables 3.3.5.1-1 and 3.3.5.2-1 from the same variables.

Cooper Nuclear Station

cc:

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