



**Nebraska Public Power District**

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50.90

NLS2005030  
May 25, 2005

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

**Subject:** License Amendment Request to Delete Temporary Notes from Technical Specifications  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Amendment No. 205 to License No. DPR-46 for Cooper Nuclear Station dated July 14, 2004 (ADAMS Ascension No. ML041960078)
  2. Amendment No. 207 to License No. DPR-46 for Cooper Nuclear Station dated October 15, 2004 (ADAMS Ascension No. ML042920532)

The purpose of this letter is for the Nebraska Public Power District (NPPD) to request an amendment to Facility Operating License DPR-46 in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90 to revise the Cooper Nuclear Station (CNS) Technical Specifications (TS). The request is to delete from the CNS TS temporary notes that have expired and are no longer in effect. The temporary notes were added by Amendments 205 (Reference 1) and 207 (Reference 2). Because the notes are no longer in effect, this change is administrative in nature.

NPPD requests Nuclear Regulatory Commission (NRC) approval of the proposed TS change and issuance of the requested license amendment by November 30, 2005. The requested six-month NRC review period is based on the simplicity of the change and the desire to remove expired notes. The amendment will be implemented within 30 days of issuance.

Attachment 1 provides NPPD's evaluation of the proposed change. Attachment 2 provides marked up pages showing the proposed changes to the current CNS TS. Attachment 3 provides the revised TS pages in final typed format. Attachment 4 provides marked up TS Bases pages showing the proposed changes to the current Bases for NRC information.

The proposed TS changes have been reviewed by the necessary safety review committees (Station Operations Review Committee and Safety Review and Audit Board). Amendments to the CNS Facility Operating License through Amendment 211, dated March 22, 2005, have

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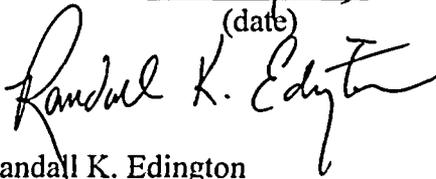
been incorporated into this request. This request is submitted under oath pursuant to 10 CFR 50.30(b).

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.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 25 May 2005  
(date)



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

/rer

Attachments

cc: Regional Administrator w/ attachments  
USNRC - Region IV

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

Senior Resident Inspector w/ attachments  
USNRC

Nebraska Health and Human Services w/ attachments  
Department of Regulation and Licensure

NPG Distribution w/o attachments

CNS Records w/ attachments

**ATTACHMENT 1**

**LICENSE AMENDMENT REQUEST TO  
DELETE TEMPORARY NOTES FROM TECHNICAL SPECIFICATIONS**

**COOPER NUCLEAR STATION  
NRC DOCKET 50-298, LICENSE DPR-46**

Revised Technical Specification Pages

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- 1.0 Description
- 2.0 Proposed Change
- 3.0 Background
- 4.0 Technical Analysis
- 5.0 Regulatory Safety Analysis
  - 5.1 No Significant Hazards Consideration (NSHC)
  - 5.2 Applicable Regulatory Requirements/Criteria
- 6.0 Environmental Consideration
- 7.0 References

## 1.0 Description

The Nebraska Public Power District (NPPD) requests that Operating License No. DPR-46 for Cooper Nuclear Station (CNS) be amended by the following revisions to the Technical Specifications (TS):

- A. Delete the temporary note from certain surveillance requirements. The temporary note states that the next required performance of the surveillance may be delayed until the current cycle refueling outage, but no later than February 2, 2005, and that the temporary note expires upon startup from that refueling outage.
- B. Delete the temporary note in Section 3.8.1, AC Sources – Operating, Required Action B.4, regarding the Completion Time of 14 days, and the temporary note in Section 3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air, Limiting Condition for Operation (LCO) regarding use of fuel oil in temporary storage tanks to support operability of a diesel generator during tank cleaning and coating maintenance activities.

## 2.0 Proposed Changes

### A. Temporary Note for One-Time Extension of Surveillance Requirements

The following eleven Surveillance Requirements (SRs) have a temporary note stating that the next required performance may be delayed until the current cycle refueling outage, but no later than February 2, 2005, and that it expires upon startup from that refueling outage.

1. SR 3.3.5.1.5
2. SR 3.3.8.1.2
3. SR 3.3.8.1.3
4. SR 3.3.8.2.1
5. SR 3.3.8.2.2
6. SR 3.5.1.9
7. SR 3.5.2.5
8. SR 3.6.1.1.2
9. SR 3.6.4.3.2
10. SR 3.6.4.3.4
11. SR 3.8.4.7

The temporary note is being deleted from each of the referenced SRs. No changes to the TS Bases are required.

### B. Temporary Note for One-Time Extension of Diesel Generator Allowed Outage Time

1. Section 3.8.1, Condition B, Required Action B.4 has a temporary note modifying its associated Completion Time. This temporary notes states:

“A Diesel Generator which is INOPERABLE solely due to its alignment to a fuel oil storage tank drained in support of fuel oil storage tank cleaning and coating shall be restored to OPERABLE status within 14 days. This temporary note is applicable only if the fuel oil level in the associated DG day tank is maintained above the low level alarm setpoint. This temporary note expires upon completion of fuel oil storage tank cleaning and coating maintenance activity, but no later than November 30, 2004.”

This temporary note is being deleted.

2. Section 3.8.3 LCO, has a temporary note that specifies certain relaxations in the requirements. This temporary notes states:

“Fuel oil level in temporary storage tanks may be utilized to support OPERABILITY of a DG during tank cleaning and coating maintenance activities. Equipment (temporary transfer pump, hoses, and appropriate fittings) capable of supplying the fuel oil in the temporary tanks to the DG must be available. The fuel oil level in the temporary tanks, in conjunction with the fuel in the permanent tank must be within the limits of Condition A and Condition C. This note is applicable only to the DG aligned to the full permanent tank. This temporary note expires upon completion of the fuel oil storage tank cleaning and coating maintenance activities but no later than November 30, 2004.”

This temporary note is being deleted.

Conforming changes to the TS Bases B 3.8.1 for Required Action B.4 and B 3.8.3 for the LCO are provided for Nuclear Regulatory Commission (NRC) information.

In summary, NPPD requests amendment of the CNS operating license to delete from TS the temporary notes that have expired.

### 3.0 Background

#### A. Temporary Note for One-Time Extension of Surveillance Requirements

Amendment No. 205, dated July 14, 2004 issued revised TS allowing a one-time extension of a limited number of SRs. The revisions consisted of adding a note, designated “TEMPORARY NOTE,” to each of the SRs. Each note stated that the next required performance of the SR may be delayed until the current cycle refueling outage, but no later than February 2, 2005, and that the temporary note expires upon startup from that refueling outage. CNS was operating in cycle number 22 when the amendment request was submitted and the amendment was issued.

**B. Temporary Note for One-Time Extension of Diesel Generator Allowed Outage Time**

Amendment No. 207, dated October 15, 2004, issued revised TS allowing (1) a one-time extension of the Allowed Outage Time for one diesel generator (DG) to be inoperable due to its alignment to a fuel oil storage tank that is drained in support of fuel oil storage tank cleaning and coating, and (2) allowance to utilize fuel oil level in temporary storage tanks to support the operability of a DG during tank cleaning and coating maintenance activities.

**4.0 Technical Analysis**

**A. Temporary Note for One-Time Extension of Surveillance Requirements**

The note contained a stated provision that the note would expire upon startup from the refueling outage occurring at the end of the current cycle. That was cycle 22 refueling outage.

CNS shut down on January 15, 2005 to begin the cycle 22 refueling outage. CNS performed the surveillances during that outage as required, and restarted on February 18, 2005 (synchronizing the main generator to the electrical grid). At that time the temporary note expired.

This change is an administrative change to delete the already-expired temporary note. No further analysis is needed.

**B. Temporary Note for One-Time Extension of Diesel Generator Allowed Outage Time**

The temporary note for TS 3.8.1 Required Action B.4 Completion Time and the temporary note for TS 3.8.3 LCO both state that the note expires upon completion of the fuel oil storage tank cleaning and coating maintenance activities but no later than November 30, 2004.

CNS brought temporary tanks and supporting equipment on site, and drained, cleaned, and coated the interior of the permanent fuel oil storage tanks one at a time. The draining, cleaning, and coating activity was completed on both tanks in early November 2004. At that time the temporary notes for TS 3.8.1 Required Action B.4 and TS 3.8.3 LCO expired.

This change is an administrative change to delete the already-expired temporary note. No further analysis is needed.

**5.0 Regulatory Safety Analysis**

**5.1 No Significant Hazards Consideration**

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

NPPD is requesting an amendment of the operating license for the Cooper Nuclear Station (CNS.) The requested amendment involves removing from the CNS Technical Specifications (TS) temporary notes that have already expired and are no longer in effect.

1. Temporary Notes for a One-Time Delay in Performing Surveillance Requirements

A total of eleven surveillance requirements in the CNS TS had been modified by a temporary note delaying the next performance. These surveillances were among those that must be performed when shutdown. The delay of these surveillances was needed to allow CNS to continue operation in operating cycle 22 until the scheduled refueling outage. The temporary note specified a date by when the surveillance would be performed and contained a provision stating that the temporary note expired upon startup from the refueling outage. CNS restarted from the cycle 22 refueling outage on February 18, 2005. At that time the temporary notes expired. This proposed amendment deletes the expired notes from the CNS TS.

2. Temporary Notes Related to Diesel Generator Allowed Outage Time and Use of Fuel Oil in Temporary Storage Tanks

CNS TS require that an inoperable diesel generator be returned to operable status within seven days. Because of a concern with corrosion on the interior surfaces of the permanent diesel fuel oil storage tanks, CNS developed a plan to drain the tanks, clean the interior surfaces, and coat the interior surfaces with a corrosion-inhibiting material. This required that the fuel oil be transferred to temporary tanks, resulting in a diesel generator being inoperable. To allow this work to be performed as soon as possible with CNS operating, a temporary note was added to allow a 14-day period to return the diesel generator to operable status, but only if it was inoperable solely due to its alignment to a temporary tank. CNS TS also require that the fuel oil be stored in permanent tanks. Thus, a temporary note was added to allow the use of temporary tanks during cleaning and coating of the permanent tanks. Both temporary notes stated that they expired upon completion of the cleaning and coating maintenance activities but no later than November 30, 2004. The cleaning and coating of both tanks was completed in early November 2004. At that time the temporary notes expired. This proposed amendment deletes the expired notes from the CNS TS.

Each of these changes has been evaluated against the three criteria of 10 CFR 50.92(c) in the following evaluation. The evaluation supports a finding of "no significant hazards" for the proposed amendment.

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

Response: No.

Deleting temporary notes that have expired from the CNS TS does not impact the plant design or how the plant is operated, nor does it affect any of the conditions that could cause an accident. Thus, this change does not result in a significant increase in the probability of an accident previously evaluated. Removing the expired temporary notes does not reduce the requirements for maintaining systems needed to mitigate postulated accidents as described in the CNS Updated Safety Analysis Report. Thus, this change does not result in a significant increase in the consequences of an accident previously evaluated. Therefore, the proposed 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?**

Response: No.

Deleting temporary notes that have expired does not involve a change to the plant design or to how the plant is operated. Therefore, the 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 a margin of safety?**

Response: No.

Deleting temporary notes that have expired does not result in a relaxation of any limit associated with the performance of systems required to mitigate postulated accidents, nor does it reduce any of the requirements for maintaining those systems. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above evaluation of the three criteria, NPPD 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.

**5.2 Applicable Regulatory Requirements/Criteria**

Removing temporary notes that have expired is needed for consistency of the TS. No regulatory requirements or criteria are applicable to the deletion of expired notes.

Therefore, CNS continues to comply with applicable regulatory requirements and criteria with the proposed license amendment.

## **6.0 Environmental Consideration**

10 CFR 51.22(b) allows that an environmental assessment (EA) or an environmental impact statement (EIS) is not required for any action included in the list of categorical exclusions in 10 CFR 51.22(c). 10 CFR 51.22(c)(9) identifies an amendment to an operating license which changes a requirement with respect to installation or use of a facility component located within the restricted area, or which changes an inspection or a surveillance requirement, as a categorical exclusion 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 EIS or EA needs to be prepared in connection with issuance of the proposed license changes. The basis for this determination is as follows:

1. The No Significant Hazards Consideration evaluation presented in Section 5.1 concluded that the requested changes do not involve a significant hazards consideration.
2. The proposed changes to TS do not impact any effluent at CNS. Therefore, the proposed changes will not result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site.
3. The proposed changes to the TS do not significantly increase individual or cumulative occupational radiation exposure.

## **7.0 References**

1. CNS License Amendment No. 205 dated July 14, 2004.
2. CNS License Amendment No. 207 dated October 15, 2004.

**ATTACHMENT 2**

**PROPOSED TECHNICAL SPECIFICATION REVISIONS  
(MARK-UP)**

**COOPER NUCLEAR STATION  
NRC DOCKET 50-298, LICENSE DPR-46**

Technical Specification Pages

3.3-36

3.3-65

3.3-68

3.5-6

3.5-10

3.6-2

3.6-40

3.8-3

3.8-13

3.8-18

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.
  2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c and 3.f; and (b) for up to 6 hours for Functions other than 3.c and 3.f provided the associated Function or the redundant Function maintains ECCS initiation capability.
- 

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	18 months
<p>-----TEMPORARY NOTE-----  <del>The next required performance of this SR for Functions 1.a and 1.b may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p>		
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.8.1-1 to determine which SRs apply for each LOP Function.
  2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 2 hours provided the associated Function maintains DG initiation capability.
- 

SURVEILLANCE	FREQUENCY
SR 3.3.8.1.1      Perform CHANNEL FUNCTIONAL TEST.	31 days
<p style="text-align: center;">-----TEMPORARY NOTE-----</p> <p><del>The next required performance of this SR for Division 1 may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p>	
SR 3.3.8.1.2      Perform CHANNEL CALIBRATION.	18 months
<p style="text-align: center;">-----TEMPORARY NOTE-----</p> <p><del>The next required performance of this SR for Division 1 may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p>	
SR 3.3.8.1.3      Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.	D.1 Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p><del>-----TEMPORARY NOTE-----</del>  <del>The next required performance of this SR for Division 1 may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p>	
<p>SR 3.3.8.2.1 Perform CHANNEL CALIBRATION. The Allowable Values shall be:</p> <ul style="list-style-type: none"> <li>a. Overvoltage <math>\leq 131</math> V with time delay set to <math>\leq 3.8</math> seconds.</li> <li>b. Undervoltage <math>\geq 109</math> V, with time delay set to <math>\leq 3.8</math> seconds.</li> <li>c. Underfrequency <math>\geq 57.2</math> Hz, with time delay set to <math>\leq 3.8</math> seconds.</li> </ul>	18 months
<p><del>-----TEMPORARY NOTE-----</del>  <del>The next required performance of this SR for Division 1 may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p>	
<p>SR 3.3.8.2.2 Perform a system functional test.</p>	18 months

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.9</p> <p><del>-----TEMPORARY NOTE----- The next required performance of this SR for the Core Spray Subsystems A and B may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> <li>1. For HPCI only, not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.</li> <li>2. Vessel injection/spray may be excluded.</li> </ol> <p>-----</p> <p>Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>
<p>SR 3.5.1.10</p> <p>-----NOTE----- Valve actuation may be excluded.</p> <p>-----</p> <p>Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>
<p>SR 3.5.1.11</p> <p>-----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.</p> <p>-----</p> <p>Verify each ADS valve opens when manually actuated.</p>	<p>18 months</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY												
SR 3.5.2.4	<p>Verify each required ECCS pump develops the specified flow rate against a system head corresponding to the specified reactor pressure.</p> <table border="1"> <thead> <tr> <th>SYSTEM</th> <th>FLOW RATE</th> <th>NO. OF PUMPS</th> <th>SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF</th> </tr> </thead> <tbody> <tr> <td>CS</td> <td>≥ 4720 gpm</td> <td>1</td> <td>≥ 113 psig</td> </tr> <tr> <td>LPCI</td> <td>≥ 7700 gpm</td> <td>1</td> <td>≥ 20 psig</td> </tr> </tbody> </table>	SYSTEM	FLOW RATE	NO. OF PUMPS	SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF	CS	≥ 4720 gpm	1	≥ 113 psig	LPCI	≥ 7700 gpm	1	≥ 20 psig	In accordance with the Inservice Testing Program
SYSTEM	FLOW RATE	NO. OF PUMPS	SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF											
CS	≥ 4720 gpm	1	≥ 113 psig											
LPCI	≥ 7700 gpm	1	≥ 20 psig											
SR 3.5.2.5	<p>-----NOTE----- Vessel injection/spray may be excluded. -----</p> <p><del>-----TEMPORARY NOTE----- The next required performance of this SR for the Core Spray Subsystems A and B may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p> <p>Verify each required ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	18 months												

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.1.1.1      Perform required visual examinations and leakage rate testing except for primary containment air lock testing, in accordance with the Primary Containment Leakage Rate Testing Program.</p>	<p>In accordance with the Primary Containment Leakage Rate Testing Program</p>
<p><del>-----TEMPORARY NOTE-----</del></p>	
<p><del>The next required performance of this SR may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p>	
<p>SR 3.6.1.1.2      Verify drywell to suppression chamber bypass leakage is equivalent to a hole &lt; 1.0 inch in diameter.</p>	<p>18 months</p> <p><u>AND</u></p> <p>-----NOTE----- Only required after two consecutive tests fail and continues until two consecutive tests pass</p> <p>-----</p> <p>9 months</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. (continued)	E.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> E.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.3.1 Operate each SGT subsystem for $\geq 10$ continuous hours with heaters operating.	31 days
<del>-----TEMPORARY NOTE-----                      The next required performance of this SR may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del>	
SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.	18 months
<del>-----TEMPORARY NOTE-----                      The next required performance of this SR may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del>	
SR 3.6.4.3.4 Verify the SGT units cross tie damper is in the correct position, and each SGT room air supply check valve and SGT dilution air shutoff valve can be opened.	18 months

Actions

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.3.1 Determine OPERABLE DG is not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	B.3.2 Perform SR 3.8.1.2 for OPERABLE DG.	24 hours
	<u>AND</u> B.4 Restore DG to OPERABLE status.	7 days  <u>AND</u> 14 days from discovery of failure to meet LCO

-----TEMPORARY NOTE -----

~~\* A Diesel Generator which is INOPERABLE solely due to its alignment to a fuel oil storage tank drained in support of fuel oil storage tank cleaning and coating shall be restored to OPERABLE status within 14 days. This temporary note is applicable only if the fuel oil level in the associated DG day tank is maintained above the low level alarm setpoint. This temporary note expires upon completion of the fuel oil storage tank cleaning and coating maintenance activity, but no later than November 30, 2004.~~

C. Two offsite circuits inoperable.	C.1 Declare required feature(s) inoperable when the redundant required feature(s) are inoperable.	12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)
	<u>AND</u> C.2 Restore one offsite circuit to OPERABLE status.	24 hours

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3            The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

-----TEMPORARY NOTE-----

Fuel oil level in temporary storage tanks may be utilized to support OPERABILITY of a DG during tank cleaning and coating maintenance activities. Equipment (temporary transfer pump, hoses, and appropriate fittings) capable of supplying the fuel oil in the temporary tanks to the DG must be available. The fuel oil level in the temporary tanks, in conjunction with the fuel in the permanent tank must be within the limits of Condition A and Condition C. This note is applicable only to the DG aligned to the full permanent tank. This temporary note expires upon completion of the fuel oil storage tank cleaning and coating maintenance activities but no later than November 30, 2004.

APPLICABILITY:    When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----

Separate Condition entry is allowed for each DG, except for Conditions A, C, and D.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Fuel oil level < 49,500 gal and > 42,800 gal in storage tanks.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < 504 gal and > 432 gal.	B.1 Restore lube oil inventory to within limits.	48 hours
C. Stored fuel oil total particulates not within limit.	C.1 Restore stored fuel oil total particulates to within limit.	7 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.4.6      Verify:</p> <p>    a.    Each required 125 V battery charger supplies <math>\geq</math> 200 amps at <math>\geq</math> 125 V for <math>\geq</math> 4 hours; and</p> <p>    b.    Each required 250 V battery charger supplies <math>\geq</math> 200 amps at <math>\geq</math> 250 V for <math>\geq</math> 4 hours.</p>	<p>18 months</p>
<p><del>-----TEMPORARY NOTE-----</del></p> <p><del>The next required performance of this SR for the Division 1 batteries may be delayed until the current cycle refueling outage, but no later than February 2, 2005. This temporary note expires upon startup from that refueling outage.</del></p>	
<p>SR 3.8.4.7      -----NOTES-----</p> <p>    1.    The modified performance discharge test in SR 3.8.4.8 may be performed in lieu of the service test in SR 3.8.4.7 once per 60 months.</p> <p>    2.    This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.</p> <p>-----</p> <p>Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.</p>	<p>18 months</p>

(continued)

**ATTACHMENT 3  
PROPOSED TECHNICAL SPECIFICATION REVISIONS  
(FINAL TYPED)**

**COOPER NUCLEAR STATION  
NRC DOCKET 50-298, LICENSE DPR-46**

Technical Specification Pages

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SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.
  2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c and 3.f; and (b) for up to 6 hours for Functions other than 3.c and 3.f provided the associated Function or the redundant Function maintains ECCS initiation capability.
- 

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.8.1-1 to determine which SRs apply for each LOP Function.
  2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 2 hours provided the associated Function maintains DG initiation capability.
- 

SURVEILLANCE		FREQUENCY
SR 3.3.8.1.1	Perform CHANNEL FUNCTIONAL TEST.	31 days
SR 3.3.8.1.2	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.8.1.3	Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.	D.1 Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE	FREQUENCY
SR 3.3.8.2.1 Perform CHANNEL CALIBRATION. The Allowable Values shall be: <ul style="list-style-type: none"> <li>a. Overvoltage <math>\leq 131</math> V with time delay set to <math>\leq 3.8</math> seconds.</li> <li>b. Undervoltage <math>\geq 109</math> V, with time delay set to <math>\leq 3.8</math> seconds.</li> <li>c. Underfrequency <math>\geq 57.2</math> Hz, with time delay set to <math>\leq 3.8</math> seconds.</li> </ul>	18 months
SR 3.3.8.2.2 Perform a system functional test.	18 months

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.9</p> <p style="text-align: center;">-----NOTES-----</p> <ol style="list-style-type: none"> <li>1. For HPCI only, not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.</li> <li>2. Vessel injection/spray may be excluded.</li> </ol> <p style="text-align: center;">-----</p> <p>Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>
<p>SR 3.5.1.10</p> <p style="text-align: center;">-----NOTE-----</p> <p>Valve actuation may be excluded.</p> <p style="text-align: center;">-----</p> <p>Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>
<p>SR 3.5.1.11</p> <p style="text-align: center;">-----NOTE-----</p> <p>Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.</p> <p style="text-align: center;">-----</p> <p>Verify each ADS valve opens when manually actuated.</p>	<p>18 months</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY																								
SR 3.5.2.4	<p>Verify each required ECCS pump develops the specified flow rate against a system head corresponding to the specified reactor pressure.</p> <table border="0" style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <td></td> <td style="text-align: center;">NO.</td> <td style="text-align: center;">SYSTEM HEAD</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">OF</td> <td style="text-align: center;">CORRESPONDING</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">PUMPS</td> <td style="text-align: center;">TO A REACTOR</td> </tr> <tr> <td style="text-align: center;"><u>SYSTEM</u></td> <td style="text-align: center;"><u>FLOW RATE</u></td> <td></td> <td style="text-align: center;"><u>PRESSURE OF</u></td> </tr> <tr> <td style="text-align: center;">CS</td> <td style="text-align: center;">≥ 4720 gpm</td> <td style="text-align: center;">1</td> <td style="text-align: center;">≥ 113 psig</td> </tr> <tr> <td style="text-align: center;">LPCI</td> <td style="text-align: center;">≥ 7700 gpm</td> <td style="text-align: center;">1</td> <td style="text-align: center;">≥ 20 psig</td> </tr> </table>			NO.	SYSTEM HEAD			OF	CORRESPONDING			PUMPS	TO A REACTOR	<u>SYSTEM</u>	<u>FLOW RATE</u>		<u>PRESSURE OF</u>	CS	≥ 4720 gpm	1	≥ 113 psig	LPCI	≥ 7700 gpm	1	≥ 20 psig	In accordance with the Inservice Testing Program
		NO.	SYSTEM HEAD																							
		OF	CORRESPONDING																							
		PUMPS	TO A REACTOR																							
<u>SYSTEM</u>	<u>FLOW RATE</u>		<u>PRESSURE OF</u>																							
CS	≥ 4720 gpm	1	≥ 113 psig																							
LPCI	≥ 7700 gpm	1	≥ 20 psig																							
SR 3.5.2.5	<p>-----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify each required ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	18 months																								

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE		FREQUENCY
SR 3.6.1.1.1	Perform required visual examinations and leakage rate testing except for primary containment air lock testing, in accordance with the Primary Containment Leakage Rate Testing Program.	In accordance with the Primary Containment Leakage Rate Testing Program
SR 3.6.1.1.2	Verify drywell to suppression chamber bypass leakage is equivalent to a hole < 1.0 inch in diameter.	18 months  <u>AND</u>  -----NOTE----- Only required after two consecutive tests fail and continues until two consecutive tests pass -----  9 months

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. (continued)	E.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	E.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for $\geq 10$ continuous hours with heaters operating.	31 days
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	18 months
SR 3.6.4.3.4	Verify the SGT units cross tie damper is in the correct position, and each SGT room air supply check valve and SGT dilution air shutoff valve can be opened.	18 months

Actions

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B. (continued)</p>	<p>B.3.1 Determine OPERABLE DG is not inoperable due to common cause failure.</p> <p><u>OR</u></p> <p>B.3.2 Perform SR 3.8.1.2 for OPERABLE DG.</p> <p><u>AND</u></p> <p>B.4 Restore DG to OPERABLE status.</p>	<p>24 hours</p> <p>24 hours</p> <p>7 days</p> <p><u>AND</u></p> <p>14 days from discovery of failure to meet LCO</p>
<p>C. Two offsite circuits inoperable.</p>	<p>C.1 Declare required feature(s) inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>C.2 Restore one offsite circuit to OPERABLE status.</p>	<p>12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)</p> <p>24 hours</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----  
Separate Condition entry is allowed for each DG, except for Conditions A, C, and D.  
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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Fuel oil level < 49,500 gal and > 42,800 gal in storage tanks.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < 504 gal and > 432 gal.	B.1 Restore lube oil inventory to within limits.	48 hours
C. Stored fuel oil total particulates not within limit.	C.1 Restore stored fuel oil total particulates to within limit.	7 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.8.4.6	<p>Verify:</p> <ul style="list-style-type: none"> <li>a. Each required 125 V battery charger supplies <math>\geq</math> 200 amps at <math>\geq</math> 125 V for <math>\geq</math> 4 hours; and</li> <li>b. Each required 250 V battery charger supplies <math>\geq</math> 200 amps at <math>\geq</math> 250 V for <math>\geq</math> 4 hours.</li> </ul>	18 months
SR 3.8.4.7	<p>-----NOTES-----</p> <ul style="list-style-type: none"> <li>1. The modified performance discharge test in SR 3.8.4.8 may be performed in lieu of the service test in SR 3.8.4.7 once per 60 months.</li> <li>2. This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.</li> </ul> <p>-----</p> <p>Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.</p>	18 months

(continued)

**ATTACHMENT 4  
PROPOSED TECHNICAL SPECIFICATIONS BASES REVISIONS  
MARKUP FORMAT**

**COOPER NUCLEAR STATION  
NRC DOCKET 50-298, LICENSE DPR-46**

Technical Specification Bases Pages

B 3.8-11

B 3.8-33

Note: TS Bases pages are provided for information. Following approval of the proposed TS change, Bases changes will be implemented in accordance with TS 5.5.10, "Technical Specification (TS) Bases Control Program."

BASES

ACTIONS B.4  
(continued)

In Condition B, the remaining OPERABLE DG and offsite circuits are adequate to supply electrical power to the onsite Class 1E Distribution System. The 7 day Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and low probability of a DBA occurring during this period.

-----Temporary Note-----

The 7 day completion time to restore a DG to OPERABLE status is temporarily extended to 14 days if the DG is inoperable due to alignment to a fuel oil storage tank that is drained in support of tank cleaning and coating maintenance activities. The inoperable DG must be available to start and load. The day tank level for the inoperable DG must be maintained above the low level alarm setpoint to ensure the DG safety function is maintained while actions to supply fuel from the opposite division fuel oil storage tank are being performed. A DG that is inoperable for any other reason must be restored within the 7-day completion time requirement. This temporary extension of Condition B.4 Completion Time does not apply to the 14 day maximum Completion Time. The maximum time allowed for any combination of required AC power sources to be inoperable remains 14 days. This temporary extension to Condition B.4 Completion Time expires upon completion of the fuel oil storage tank cleaning and coating maintenance activity, but no later than November 30, 2004.

The second Completion Time for Required Action B.4 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, an offsite circuit is inoperable and that circuit is subsequently restored OPERABLE, the LCO may already have been not met for up to 7 days. This situation could lead to a total of 14 days, since initial failure of the LCO, to restore the DG. At this time, an offsite circuit could again become inoperable, the DG restored OPERABLE, and an additional 7 days (for a total of 21 days) allowed prior to complete restoration of the LCO. The 14 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connector between the 7 day and 14 day Completion Times means that both Completion Times apply simultaneously, and the more restrictive must be met.

(continued)

BASES (continued)

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APPLICABLE SAFETY ANALYSES The initial conditions of Design Basis Accident (DBA) and transient analyses in USAR, Chapter VI (Ref. 4), and Chapter XIV (Ref. 5), assume Engineered Safety Feature (ESF) systems are OPERABLE. The DGs are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that fuel, Reactor Coolant System, and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Section 3.2, Power Distribution Limits; Section 3.5, Emergency Core Cooling Systems (ECCS) and Reactor Core Isolation Cooling (RCIC) System; and Section 3.6, Containment Systems.

Since diesel fuel oil, lube oil, and starting air subsystems support the operation of the standby AC power sources, they satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 6).

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-----Temporary Note-----

~~The Limiting Condition for Operation is modified by a temporary note indicating temporary storage tanks may be used on a one time basis during tank cleaning and coating maintenance activities. Fuel stored in the temporary tanks, in conjunction with fuel oil in one permanent storage tank, may be utilized to maintain the DG aligned to the permanent storage tank OPERABLE. A temporary transfer pump with a capacity greater than 5 gpm must be pre-staged and available to transfer the off-loaded fuel to the DG. This is considered sufficient based on fuel in the permanent tank providing a minimum 4 days full load operation of the DG, contingency measures which pre-stage equipment necessary to transfer the fuel in the temporary tanks to the permanent tank or directly to the DG day tank, and the initiation of actions to obtain replenishment fuel. This temporary note expires upon completion of the fuel oil storage tank cleaning and coating maintenance activity, but no later than November 30, 2004.~~

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LCO Stored diesel fuel oil is required in sufficient supply for 7 days of operation at maximum post-LOCA load demand. It is also required to meet specific standards for quality. Additionally, sufficient lube oil supply

(continued)

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