



Nebraska Public Power District

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50.90

NLS2011026
March 26, 2011

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

Subject: License Amendment Request for Administrative Revisions to Technical Specifications and to Remove an Expired One-Time Exception to the Five-Year Test Frequency for a Single Safety Valve
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Reference: Letter from Carl F. Lyon, U.S. Nuclear Regulatory Commission, to Stewart B. Minahan, Nebraska Public Power District, dated December 4, 2007, "Cooper Nuclear Station – Issuance of Amendment Re: One-Time Exception to the 5-Year Test Frequency for a Single Safety Valve (TAC No. MD6580)"

Dear Sir or Madam:

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). This request revises several pages to correct formatting errors and typographical errors. This request also revises TS Section 5.5.6, Inservice Testing Program, to remove an expired one-time exception of the five-year frequency requirement for setpoint testing of safety valve MS-RV-70ARV (Reference).

NPPD requests Nuclear Regulatory Commission (NRC) approval of the proposed TS change and issuance of the requested license amendment by March 30, 2012. The amendment will be implemented within 60 days of issuance of the amendment.

Attachment 1 provides a description of the proposed TS changes, the technical analysis basis for the changes, the no significant hazards consideration evaluation pursuant to 10 CFR 50.91(a)(1), and the environmental impact evaluation pursuant to 10 CFR 51.22. Attachment 2 provides marked up pages with the specific changes to the current CNS TS. Attachment 3 provides the revised TS pages in final format. No TS Bases pages are affected by this amendment request.

A001
NRR

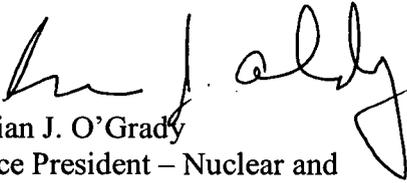
This proposed TS change has been reviewed by the necessary safety review committees (Station Operations Review Committee and Safety Review and Audit Board). Amendments to the CNS Facility Operating License through Amendment 237 dated February 28, 2011, have been incorporated into this request. This request 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 David Van Der Kamp, Licensing Manager, at (402) 825-2904.

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

Executed On: 03/26/11
Date

Sincerely,


Brian J. O'Grady
Vice President – Nuclear and
Chief Nuclear Officer

/jo

Attachments

cc: Regional Administrator w/ attachments
USNRC - Region IV

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

Senior Resident Inspector w/ attachments
USNRC - CNS

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 FOR ADMINISTRATIVE REVISIONS TO
TECHNICAL SPECIFICATIONS AND TO REMOVE AN EXPIRED
ONE-TIME EXCEPTION TO THE FIVE-YEAR TEST FREQUENCY FOR
A SINGLE SAFETY VALVE**

**COOPER NUCLEAR STATION
DOCKET NO. 50-298, DPR-46**

Revised Technical Specification Pages

3.1-9
3.1-12
3.1-13
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- 1.0** Description
- 2.0** Proposed Change
- 3.0** Technical Evaluation
- 4.0** Regulatory Analysis
 - 4.1 Precedence
 - 4.2 No Significant Hazards Consideration
 - 4.3 Conclusion
- 5.0** Environmental Consideration
- 6.0** References

1.0 Description

This license amendment request (LAR) proposes changes to correct formatting errors and typographical errors and also removes an expired one-time exception of setpoint testing of a single safety valve (Reference) from the Cooper Nuclear Station Technical Specifications (TS).

2.0 Proposed Change

This LAR is proposed to revise the following:

TS Section 3.1.3, Control Rod Operability, Page 3.1-9, by capitalizing the word “Actions” in the header of the Actions table.

TS Section 3.1.4, Control Rod Scram Times, Page 3.1-12, by adding the word “(continued)” to the bottom of the Surveillance Requirements table.

TS Section 3.1.4, Control Rod Scram Times, Page 3.1-13, by adding the word “(continued)” to the header of the Surveillance Requirements table.

TS Section 3.3.1.1, RPS Instrumentation, Page 3.3-4, by adding the word “(continued)” to the bottom of the Surveillance Requirements table.

TS Section 3.3.5.1, ECCS Instrumentation, Page 3.3-36, by formatting the footer with the Amendment number in the right margin.

TS Section 3.3.6.1, Primary Containment Isolation Instrumentation, Page 3.3-51, by formatting the footer with the Amendment number in the right margin.

TS Section 3.3.6.2, Secondary Containment Isolation Instrumentation, Page 3.3-57, by formatting the footer with the Amendment number in the right margin.

TS Section 3.3.8.1, LOP Instrumentation, Page 3.3-65, by formatting the footer with the Amendment number in the right margin.

TS Section 3.3.8.2, RPS Electric Power Monitoring, Page 3.3-68, by adding the words “ACTIONS (continued)” to the header of the Actions table, and by formatting the footer with the Amendment number in the right margin.

TS Section 3.5.1, ECCS – Operating, Page 3.5-6, by formatting the footer with the Amendment number in the right margin.

TS Section 3.5.2, ECCS – Shutdown, Page 3.5-10, by formatting the footer with the Amendment number in the right margin.

TS Section 3.6.1.1, Primary Containment, Page 3.6-2, by formatting the footer with the Amendment number in the right margin.

TS Section 3.6.4.3, SGT System, Page 3.6-40, by formatting the footer with the Amendment number in the right margin.

TS Section 3.7.4, CREF System, Page 3.7-9, by removing the word “(continued)” from the bottom of the Actions table.

TS Section 3.8.1, AC Sources – Operating, Page 3.8-3, by capitalizing the word “Actions” in the header of the Actions table and formatting the footer with the Amendment number in the right margin.

TS Section 3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air, Page 3.8-13, by formatting the footer with the Amendment number in the right margin.

TS Section 5.2, Organization, Page 5.0-2, by adding the word “(continued)” to the bottom of the page and correcting double and single line format.

TS Section 5.5, Programs and Manuals, Page 5.0-6, by adding the word “(continued)” to the bottom of the page and correcting double and single line format.

TS Section 5.5, Programs and Manuals, Page 5.0-9, by adding the word “(continued)” to the bottom of the page and correcting double and single line format.

TS Section 5.5, Programs and Manuals, Page 5.0-10, by removing paragraph b.1 of Section 5.5.6, the One-Time exception, as the 90 days has expired.

TS Section 5.5, Programs and Manuals, Page 5.0-12, by adding a space after the “C” in “30°C(86°F)”.

3.0 Technical Evaluation

No technical changes are being made. Corrections are editorial or administrative.

4.0 Regulatory Analysis

4.1 Precedence

The corrections are editorial or administrative and stand alone; therefore, no precedence is needed.

4.2 No Significant Hazards Consideration

Nebraska Public Power District (NPPD) is requesting a revision to the Facility Operating License No. DPR-46 for Cooper Nuclear Station. The requested changes are corrections to formatting and typographical errors, and also removes an expired one-time exception.

NPPD has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below.

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes correct formatting and typographical errors and removes an expired one-time exception. Administrative and editorial changes such as these are not an initiator of any accident previously evaluated. As a result, the probability of an accident previously evaluated is not affected. The consequences of an accident with the incorporation of these administrative and editorial changes are not different than the consequences of the same accident without these changes. As a result, the consequences of an accident previously evaluated are not affected by these changes.

Based on the above, it is concluded that the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes do not modify the plant design, nor do the proposed changes alter the operation of the plant or equipment involved in either routine plant operation or in the mitigation of the design basis accidents. The proposed changes are editorial or administrative only.

Based on the above, it is concluded that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed changes consist of administrative and editorial changes to correct formatting and typographical errors and to remove an expired one-time exception. The changes do not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by these changes. The proposed changes will not result in plant operation in a configuration outside of the design basis. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, NPPD concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92, paragraph (c), and, accordingly, a finding of no significant hazards consideration is justified.

4.3 Conclusion

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. Applicable regulatory requirements continue to be met, adequate defense-in-depth is maintained, and sufficient safety margins are maintained.

In conclusion, based on the considerations discussed above, (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.

5.0 Environmental Consideration

10 CFR 51.22(c) provides categories of actions which are categorical exclusions from performing an environmental assessment. An action which is a categorical exclusion does not require an environmental assessment or an environmental impact statement. 10 CFR 51.22(c)(9) allows as a categorical exclusion issuance of an amendment to a license for a reactor pursuant to 10 CFR Part 50 which changes a requirement with respect to installation or use of a facility component located within a restricted area as defined in 10 CFR Part 20, or which changes an inspection or a surveillance requirement, provided that (1) the amendment involves no significant hazards consideration, (2) there is no significant change in the types or significant increase in the amounts of any effluents that

may be released off-site, and (3) there is no significant 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). The basis for this determination is as follows:

1. The proposed license amendment does not involve significant hazards as described previously in the No Significant Hazards Consideration Evaluation.
2. The proposed license amendment does not introduce any new equipment, nor does it require any existing equipment or systems to perform a different type of function than they are presently designed to perform. NPPD has concluded that this proposed change does 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. These changes do not adversely affect plant systems or operation and therefore, do not significantly increase individual or cumulative occupational radiation exposure beyond that already associated with normal operation.

Therefore, pursuant to 10 CFR 51.22(c), no environmental impact statement or environmental assessment needs to be prepared in connection with issuance of the proposed license changes.

6.0 References

Letter from Carl F. Lyon, U.S. Nuclear Regulatory Commission, to Stewart B. Minahan, Nebraska Public Power District, dated December 4, 2007, "Cooper Nuclear Station – Issuance of Amendment Re: One-Time Exception to the 5-Year Test Frequency for a Single Safety Valve (TAC No. MD6580)"

ATTACHMENT 2

**LICENSE AMENDMENT REQUEST FOR ADMINISTRATIVE REVISIONS TO
TECHNICAL SPECIFICATIONS AND TO REMOVE AN EXPIRED
ONE-TIME EXCEPTION TO THE FIVE-YEAR TEST FREQUENCY FOR
A SINGLE SAFETY VALVE**

**COOPER NUCLEAR STATION
DOCKET NO. 50-298, DPR-46**

Revised Technical Specification Pages – Markup Format

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3.8-13
5.0-2
5.0-6
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5.0-12

3.1 REACTIVITY CONTROL SYSTEMS

3.1.4 Control Rod Scram Times

- LCO 3.1.4
- a. No more than 10 OPERABLE control rods shall be "slow," in accordance with Table 3.1.4-1; and
 - b. No more than 2 OPERABLE control rods that are "slow" shall occupy adjacent locations.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of the LCO not met.	A.1 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

-----NOTE-----
During single control rod scram time Surveillances, the control rod drive (CRD) pumps shall be isolated from the associated scram accumulator.

SURVEILLANCE	FREQUENCY
SR 3.1.4.1 Verify each control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure \geq 800 psig.	Prior to exceeding 40% RTP after each reactor shutdown \geq 120 days
SR 3.1.4.2 Verify, for a representative sample, each tested control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure \geq 800 psig.	200 days cumulative operation in MODE 1

← (continued)

Corrected by letter dated 5/3/06

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.4.3	Verify each affected control rod scram time is within the limits of Table 3.1.4-1 with any reactor steam dome pressure.	Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect scram time
SR 3.1.4.4	Verify each affected control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure \geq 800 psig.	Prior to exceeding 40% RTP after fuel movement within the affected core cell AND Prior to exceeding 40% RTP after work on control rod or CRD System that could affect scram time

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.5	Verify the source range monitor (SRM) and intermediate range monitor (IRM) channels overlap.	Prior to withdrawing SRMs from the fully inserted position
SR 3.3.1.1.6	<p style="text-align: center;"><u>NOTE</u></p> <p>Only required to be met during entry into MODE 2 from MODE 1.</p> <hr/> <p>Verify the IRM and APRM channels overlap.</p>	7 days
SR 3.3.1.1.7	Adjust the channel to conform to a calibrated flow signal.	31 days
SR 3.3.1.1.8	Calibrate the local power range monitors.	1000 MWD/T average core exposure
SR 3.3.1.1.9	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.1.1.10	<p style="text-align: center;"><u>NOTES</u></p> <p>1. Neutron detectors and recirculation loop flow transmitters are excluded.</p> <p>2. For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2.</p> <hr/> <p>Perform CHANNEL CALIBRATION.</p>	184 days

← (continued)

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

Primary Containment Isolation Instrumentation
3.3.6.1

Table 3.3.6.1-1 (page 1 of 3)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Main Steam Line Isolation					
a. Reactor Vessel Water Level - Low Low Low (Level 1)	1,2,3	2	D	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ -113 inches
b. Main Steam Line Pressure - Low	1	2	E	SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6	≥ 835 psig
c. Main Steam Line Flow - High	1,2,3	2 per MSL	D	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 142.7% rated steam flow
d. Condenser Vacuum - Low	1, 2(a), 3(a)	2	D	SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6	≥ 8 inches Hg vacuum
e. Main Steam Tunnel Temperature - High	1,2,3	2 per location	D	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 195°F
2. Primary Containment Isolation					
a. Reactor Vessel Water Level - Low (Level 3)	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ 3 inches
b. Drywell Pressure - High	1,2,3	2	G	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 1.84 psig
c. Reactor Building Ventilation Exhaust Plenum Radiation - High	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 49 mR/hr
d. Main Steam Line Radiation - High	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 3 times full power background
e. Reactor Vessel Water Level -Low Low Low (Level 1)	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ -113 inches

(continued)

(a) With any turbine stop valve not closed.

Amendment 234

3.3-51

~~6/30/08~~

Cooper

Amendment No.

Secondary Containment Isolation Instrumentation
3.3.6.2

Table 3.3.6.2-1 (page 1 of 1)
Secondary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level - Low Low (Level 2)	1,2,3, (a)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4	\geq - 42 inches
2. Drywell Pressure - High	1,2,3	2	SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4	\leq 1.84 psig
3. Reactor Building Ventilation Exhaust Plenum Radiation - High	1,2,3, (a),(b)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4	\leq 49 mR/hr

- (a) During operations with a potential for draining the reactor vessel.
- (b) During movement of recently irradiated fuel assemblies in secondary containment.

~~Amendment 222~~

3.3-57

← Cooper

Amendment No.

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

~~Amendment 213~~

Cooper

3.3-65

Amendment No.

← 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
SR 3.3.8.2.1	Perform CHANNEL CALIBRATION. The Allowable Values shall be: a. Overvoltage ≤ 131 V with time delay set to ≤ 3.8 seconds. b. Undervoltage ≥ 109 V, with time delay set to ≤ 3.8 seconds. c. Underfrequency ≥ 57.2 Hz, with time delay set to ≤ 3.8 seconds.	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> <p>1. For HPCI only, not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test.</p> <p>2. Vessel injection/spray may be excluded.</p> <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	Verify each required ECCS pump develops the specified flow rate against a system head corresponding to the specified reactor pressure.			In accordance with the Inservice Testing Program
			SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF	
	<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>NO. OF PUMPS</u>	
	CS	≥ 4720 gpm	1	
LPCI	≥ 7700 gpm	1	≥ 113 psig ≥ 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
<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>SR 3.6.1.1.2 Verify drywell to suppression chamber bypass leakage is equivalent to a hole < 1.0 inch in diameter.</p>	<p>18 months</p> <p>AND</p> <p>-----NOTE----- Only required after two consecutive tests fail and continues until two consecutive tests pass</p> <hr/> <p>9 months</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. (continued)	E.2 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 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

~~Amendment 222~~

Cooper

3.6-40

~~Amendment No.~~

Actions ← ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	<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>
C. Two offsite circuits Inoperable.	<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.

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)

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

[extended double line]

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the USAR.
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The corporate officer with direct responsibility for the plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff, carry out radiological protection functions, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned when the reactor contains fuel and two additional non-licensed operators shall be assigned when the reactor is operating in MODES 1, 2, or 3.

(continued)

[added single line]

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented and maintained.

[extended double line]

5.5.1 Offsite Dose Assessment Manual (ODAM)

- a. The ODAm shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODAm shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release reports required by Specification 5.6.2 and Specification 5.6.3.
- c. Licensee initiated changes to the ODAm:
 - 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - b. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
 - 2. Shall become effective after review and acceptance by the Station Operations Review Committee (SORC) and the approval of the plant manager; and
 - 3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODAm as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODAm was made. Each change shall be identified by

[added single line]

(continued)

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

[extended single line]

- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary shall be limited to the following:
 - 1. For noble gases: less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
 - 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the USAR Section III-3.5, cyclic and transient occurrences to ensure that components are maintained within the design limits.

[added single line]

(continued)

5.5 Programs and Manuals (continued)

5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves:

- a. Testing Frequencies applicable to the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda are as follows:

<u>ASME OM Code and applicable Addenda terminology for inservice testing activities</u>	<u>Required Frequencies for performing inservice testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities;

deleted paragraph

~~1. One-time Exception: Setpoint testing of safety valve MS-RV-70ARV, as required by ASME OM Code Mandatory Appendix I, paragraph I 1320, may be delayed until start of Cycle 24 refueling outage, but no later than June 8, 2008 (90 days from expiration of the 5-year interval on March 10, 2008).~~

- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, Section C.6.b shows the methyl iodide penetration less than or equal to the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C(86°F) and the relative humidity specified below.

ESF Ventilation System adding a space here

	<u>Penetration:</u> (%)	<u>Relative Humidity:</u> (%)
SGT System	2.5	70
Control Room Emergency Filter System	2.5	95

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified as follows:

<u>ESF Ventilation System</u>	<u>Delta P (inches Wq)</u>	<u>Flowrate (cfm)</u>
SGT System	< 6	1602 to 1958
Control Room Emergency Filter System	< 6	810 to 990

(continued)

ATTACHMENT 3

**LICENSE AMENDMENT REQUEST FOR ADMINISTRATIVE REVISIONS TO
TECHNICAL SPECIFICATIONS AND TO REMOVE AN EXPIRED
ONE-TIME EXCEPTION TO THE FIVE-YEAR TEST FREQUENCY FOR
A SINGLE SAFETY VALVE**

**COOPER NUCLEAR STATION
DOCKET NO. 50-298, DPR-46**

Revised Technical Specification Pages – Final Type Format

3.1-9
3.1-12
3.1-13
3.3-4
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3.7-9
3.8-3
3.8-13
5.0-2
5.0-6
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5.0-10
5.0-12

3.1 REACTIVITY CONTROL SYSTEMS

3.1.4 Control Rod Scram Times

- LCO 3.1.4
- a. No more than 10 OPERABLE control rods shall be "slow," in accordance with Table 3.1.4-1; and
 - b. No more than 2 OPERABLE control rods that are "slow" shall occupy adjacent locations.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of the LCO not met.	A.1 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

-----NOTE-----

During single control rod scram time Surveillances, the control rod drive (CRD) pumps shall be isolated from the associated scram accumulator.

SURVEILLANCE	FREQUENCY
SR 3.1.4.1 Verify each control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure \geq 800 psig.	Prior to exceeding 40% RTP after each reactor shutdown \geq 120 days

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.1.4.2	Verify, for a representative sample, each tested control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure ≥ 800 psig.	200 days cumulative operation in MODE 1
SR 3.1.4.3	Verify each affected control rod scram time is within the limits of Table 3.1.4-1 with any reactor steam dome pressure.	Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect scram time
SR 3.1.4.4	Verify each affected control rod scram time is within the limits of Table 3.1.4-1 with reactor steam dome pressure ≥ 800 psig.	Prior to exceeding 40% RTP after fuel movement within the affected core cell <u>AND</u> Prior to exceeding 40% RTP after work on control rod or CRD System that could affect scram time

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.5	Verify the source range monitor (SRM) and intermediate range monitor (IRM) channels overlap.	Prior to withdrawing SRMs from the fully inserted position
SR 3.3.1.1.6	<p>-----NOTE----- Only required to be met during entry into MODE 2 from MODE 1. -----</p> <p>Verify the IRM and APRM channels overlap.</p>	7 days
SR 3.3.1.1.7	Adjust the channel to conform to a calibrated flow signal.	31 days
SR 3.3.1.1.8	Calibrate the local power range monitors.	1000 MWD/T average core exposure
SR 3.3.1.1.9	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.1.1.10	<p>-----NOTES----- 1. Neutron detectors and recirculation loop flow transmitters are excluded. 2. For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. -----</p> <p>Perform CHANNEL CALIBRATION.</p>	184 days

(continued)

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

Table 3.3.6.1-1 (page 1 of 3)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Main Steam Line Isolation					
a. Reactor Vessel Water Level - Low Low Low (Level 1)	1,2,3	2	D	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ -113 inches
b. Main Steam Line Pressure - Low	1	2	E	SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6	≥ 835 psig
c. Main Steam Line Flow - High	1,2,3	2 per MSL	D	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 142.7% rated steam flow
d. Condenser Vacuum - Low	1, 2(a), 3(a)	2	D	SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6	≥ 8 inches Hg vacuum
e. Main Steam Tunnel Temperature - High	1,2,3	2 per location	D	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 195°F
2. Primary Containment Isolation					
a. Reactor Vessel Water Level - Low (Level 3)	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ 3 inches
b. Drywell Pressure - High	1,2,3	2	G	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 1.84 psig
c. Reactor Building Ventilation Exhaust Plenum Radiation- High	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 49 mR/hr
d. Main Steam Line Radiation - High	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.5 SR 3.3.6.1.6	≤ 3 times full power background
e. Reactor Vessel Water Level -Low Low Low (Level 1)	1,2,3	2	F	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ -113 inches

(continued)

(a) With any turbine stop valve not closed.

Table 3.3.6.2-1 (page 1 of 1)
Secondary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level - Low Low (Level 2)	1,2,3, (a)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4	≥ - 42 inches
2. Drywell Pressure - High	1,2,3	2	SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4	≤ 1.84 psig
3. Reactor Building Ventilation Exhaust Plenum Radiation - High	1,2,3, (a),(b)	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4	≤ 49 mR/hr

- (a) During operations with a potential for draining the reactor vessel.
- (b) During movement of recently irradiated fuel assemblies in secondary containment.

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

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
SR 3.3.8.2.1 Perform CHANNEL CALIBRATION. The Allowable Values shall be: <ul style="list-style-type: none"> a. Overvoltage ≤ 131 V with time delay set to ≤ 3.8 seconds. b. Undervoltage ≥ 109 V, with time delay set to ≤ 3.8 seconds. c. Underfrequency ≥ 57.2 Hz, with time delay set to ≤ 3.8 seconds. 	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>-----NOTES-----</p> <ol style="list-style-type: none"> 1. For HPCI only, not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. 2. Vessel injection/spray may be excluded. <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-----</p> <p>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-----</p> <p>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="0"> <tr> <td></td> <td></td> <td style="text-align: center;">SYSTEM HEAD</td> <td></td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">CORRESPONDING</td> <td></td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">TO A REACTOR</td> <td></td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">PRESSURE OF</td> <td></td> </tr> <tr> <td style="text-align: center;"><u>SYSTEM</u></td> <td style="text-align: center;"><u>FLOW RATE</u></td> <td style="text-align: center;"><u>NO. OF PUMPS</u></td> <td style="text-align: center;"><u>PRESSURE OF</u></td> </tr> <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> </table>			SYSTEM HEAD				CORRESPONDING				TO A REACTOR				PRESSURE OF		<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>NO. OF PUMPS</u>	<u>PRESSURE OF</u>	CS	≥ 4720 gpm	1	≥ 113 psig	LPCI	≥ 7700 gpm	1	≥ 20 psig	In accordance with the Inservice Testing Program
		SYSTEM HEAD																												
		CORRESPONDING																												
		TO A REACTOR																												
		PRESSURE OF																												
<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>NO. OF PUMPS</u>	<u>PRESSURE OF</u>																											
CS	≥ 4720 gpm	1	≥ 113 psig																											
LPCI	≥ 7700 gpm	1	≥ 20 psig																											
SR 3.5.2.5	<p style="text-align: center;">-----NOTE-----</p> <p>Vessel injection/spray may be excluded.</p> <p style="text-align: center;">-----</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.	<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>9 months</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. (continued)	E.2 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 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 (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Required Action and associated Completion Time of Condition A not met during movement of lately irradiated fuel assemblies in the secondary containment or during OPDRVs.</p> <p><u>OR</u></p> <p>CREF System inoperable due to an inoperable CRE boundary during movement of lately irradiated fuel assemblies in the secondary containment or during OPDRVs.</p>	<p>-----NOTE----- LCO 3.0.3 is not applicable. -----</p> <p>D.1 Suspend movement of lately irradiated fuel assemblies in the secondary containment.</p> <p><u>AND</u></p> <p>D.2 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p> <p>Immediately</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	<p>B.3.1 Determine OPERABLE DG is not inoperable due to common cause failure.</p> <p style="text-align: center;"><u>OR</u></p> <p>B.3.2 Perform SR 3.8.1.2 for OPERABLE DG.</p> <p style="text-align: center;"><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>
C. Two offsite circuits inoperable.	<p>C.1 Declare required feature(s) inoperable when the redundant required feature(s) are inoperable.</p> <p style="text-align: center;"><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.

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)

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the USAR.
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The corporate officer with direct responsibility for the plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff, carry out radiological protection functions, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be assigned when the reactor contains fuel and two additional non-licensed operators shall be assigned when the reactor is operating in MODES 1, 2, or 3.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented and maintained.

5.5.1 Offsite Dose Assessment Manual (ODAM)

- a. The ODA M shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODA M shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release reports required by Specification 5.6.2 and Specification 5.6.3.
- c. Licensee initiated changes to the ODA M:
 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - b. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
 2. Shall become effective after review and acceptance by the Station Operations Review Committee (SORC) and the approval of the plant manager; and
 3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODA M as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODA M was made. Each change shall be identified by

(continued)

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary shall be limited to the following:
 - 1. For noble gases: less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
 - 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the USAR Section III-3.5, cyclic and transient occurrences to ensure that components are maintained within the design limits.

(continued)

5.5 Programs and Manuals (continued)

5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves:

- a. Testing Frequencies applicable to the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda are as follows:

<u>ASME OM Code and applicable Addenda terminology for inservice testing activities</u>	<u>Required Frequencies for performing inservice testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, Section C.6.b shows the methyl iodide penetration less than or equal to the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and the relative humidity specified below.

	<u>ESF Ventilation System</u>	
	<u>Penetration:</u> %	<u>Relative Humidity:</u> %
SGT System	2.5	70
Control Room Emergency Filter System	2.5	95

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified as follows:

<u>ESF Ventilation System</u>	<u>Delta P (inches Wg)</u>	<u>Flowrate (cfm)</u>
SGT System	< 6	1602 to 1958
Control Room Emergency Filter System	< 6	810 to 990

(continued)

Correspondence Number: NLS2011026

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only 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	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
None		