



Nebraska Public Power District

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NLS2015055

May 4, 2015

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

Subject: Correction to License Amendment Request to Revise Technical Specifications to Add Residual Heat Removal System Containment Spray Function
Cooper Nuclear Station, Docket No. 50-298, License No. DPR-46

Reference: Letter from Oscar A. Limpias, Nebraska Public Power District, to U.S. Nuclear Regulatory Commission dated January 15, 2015, "License Amendment Request to Revise Technical Specifications to Add Residual Heat Removal System Containment Spray Function" (NLS2014087) (ML15021A27)

Dear Sir or Madam:

The purpose of this letter is for the Nebraska Public Power District to correct an error on a Technical Specifications (TS) page submitted with the proposed referenced amendment to add new section, TS 3.6.1.9, Residual Heat Removal Containment Spray, and add related drywell pressure switches to TS 3.3.5.1, Emergency Core Cooling System Instrumentation.

The proposed License Amendment Request (LAR) contains an error associated with the changes requested to Table 3.3.5.1-1, Emergency Core Cooling System Instrumentation on TS page 3.3-39. The proposed LAR relocates the Containment Pressure-High instrument from the Technical Requirements Manual (TRM) to the TS Section 3.3.5.1, Table 3.3.5.1-1 Function 2.h. In the proposed LAR it is shown that Surveillance Requirement 3.3.5.1.4 is correctly applied to this function, but inappropriately indicates that footnotes (c) and (d) are applicable for this function.

Footnotes (c) and (d) to Table 3.3.5.1-1 were specifically added by TS Amendment 242, Implementation of 24-Month Fuel Cycle and Adoption of TSTF-493, Revision 4, Option A (TAC No. ME7169) for other functions in the table. TSTF-493, Revision 4, is titled "Clarify Application of Setpoint Methodology for LSSS Functions." The Containment Spray function, which is being relocated to the TS, is not considered a Limiting Safety System Setting (LSSS) as there is no Safety Limit established for this function. Those functions that have been identified as LSSS functions are listed in TRM Section T5.14 and the Containment Pressure-High function associated with the Containment Spray Permissive is not one of those functions listed.

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Based on the above, footnotes (c) and (d) do not apply to Table 3.3.5.1-1, Function 2.h and should be removed. The attachment to this letter includes a corrected marked up version of TS page 3.3-39 and a corrected final typed version of TS page 3.3-39 to be used by the Nuclear Regulatory Commission (NRC) in their review of the previously submitted LAR.

The change to the TS page neither impacts the conclusions of the no significant hazards consideration evaluation that was performed pursuant to 10 CFR 50.91(a)(1), nor the environmental consideration performed pursuant to 10 CFR 51.22.

No formal licensee commitments are being made in this letter.

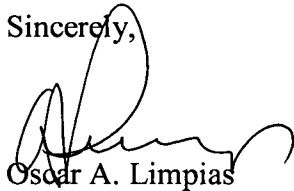
By copy of this letter and its attachments, the appropriate State of Nebraska official is notified in accordance with 10 CFR 50.91(b)(1). Copies are also provided to the NRC Region IV office and the Senior Resident Inspector in accordance with 10 CFR 50.4(b)(1).

Should you have any question concerning this matter, please contact Jim Shaw, Licensing Manager, at (402) 825-2788.

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

Executed on 5 / 04 / 15
(Date)

Sincerely,



Oscar A. Limpas
Vice President – Nuclear and
Chief Nuclear Officer

/dv

Attachment: Corrected Mark Up and Final Typed Technical Specifications Page 3.3-39

cc: Regional Administrator w/attachment
USNRC – Region IV

NPG Distribution w/o attachment

Senior Resident Inspector w/attachment
USNRC – CNS

CNS Records w/attachment

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

Cooper Project Manager w/attachment
USNRC – NRR Project Directorate IV-1

Attachment

Corrected Mark Up and Final Typed Technical Specifications Page 3.3-39

Cooper Nuclear Station, NRC Docket No. 50-298, License No. DPR-46

Table 3.3.5.1-1 (page 3 of 6)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI System (continued)					
g. Low Pressure Coolant Injection Pump Discharge Flow - Low (Bypass)	1,2,3, 4 ^(a) , 5 ^(a)	1 per subsystem 4	E B	SR 3.3.5.1.2 SR 3.3.5.1.4 ^{(c)(d)} SR 3.3.5.1.5	≥ 2107 gpm ≥ 2 psig
3. High Pressure Coolant Injection (HPCI) System					
a. Reactor Vessel Water Level - Low Low (Level 2)	1, 2 ^(f) , 3 ^(f)	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 ^{(c)(d)} SR 3.3.5.1.5	≥ -42 inches
b. Drywell Pressure - High	1, 2 ^(f) , 3 ^(f)	4	B	SR 3.3.5.1.2 SR 3.3.5.1.4 ^{(c)(d)} SR 3.3.5.1.5	≤ 1.84 psig
c. Reactor Vessel Water Level - High (Level 8)	1, 2 ^(f) , 3 ^(f)	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 54 inches
d. Emergency Condensate Storage Tank (ECST) Level - Low	1, 2 ^(f) , 3 ^(f)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5	≥ 23 inches
e. Suppression Pool Water Level - High	1, 2 ^(f) , 3 ^(f)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 4 inches

h. Containment Pressure - High

1,2,3

4

B

SR 3.3.5.1.2
SR 3.3.5.1.4
SR 3.3.5.1.5

(continued)

- (a) When the associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2, ECCS - Shutdown.
- (c) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.
- (d) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Limiting Trip Setpoint (LTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the LTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (Nominal Trip Setpoint) to confirm channel performance. The Limiting Trip Setpoint and the methodologies used to determine the as-found and the as-left tolerances are specified in the Technical Requirements Manual.
- (f) With reactor steam dome pressure > 150 psig.

Table 3.3.5.1-1 (page 3 of 6)
Emergency Core Cooling System Instrumentation

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2. LPCI System (continued)					
g. Low Pressure Coolant Injection Pump Discharge Flow - Low (Bypass)	1,2,3, 4 ^(a) , 5 ^(a)	1 per subsystem	E	SR 3.3.5.1.2 SR 3.3.5.1.4 ^{(c)(d)} SR 3.3.5.1.5	≥ 2107 gpm
h. Containment Pressure – High	1,2,3	4	B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 2 psig
3. High Pressure Coolant Injection (HPCI) System					
a. Reactor Vessel Water Level - Low Low (Level 2)	1, 2 ^(f) , 3 ^(f)	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 ^{(c)(d)} SR 3.3.5.1.5	≥ -42 inches
b. Drywell Pressure - High	1, 2 ^(f) , 3 ^(f)	4	B	SR 3.3.5.1.2 SR 3.3.5.1.4 ^{(c)(d)} SR 3.3.5.1.5	≤ 1.84 psig
c. Reactor Vessel Water Level - High (Level 8)	1, 2 ^(f) , 3 ^(f)	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 54 inches
d. Emergency Condensate Storage Tank (ECST) Level - Low	1, 2 ^(f) , 3 ^(f)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.5	≥ 23 inches
e. Suppression Pool Water Level - High	1, 2 ^(f) , 3 ^(f)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 4 inches

(continued)

(a) When the associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2, ECCS - Shutdown.

(c) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(d) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Limiting Trip Setpoint (LTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the LTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (Nominal Trip Setpoint) to confirm channel performance. The Limiting Trip Setpoint and the methodologies used to determine the as-found and the as-left tolerances are specified in the Technical Requirements Manual.

(f) With reactor steam dome pressure >150 psig.