

**Nebraska Public Power District**

LQA8000269

GENERAL OFFICE
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May 8, 1980

Director, Nuclear Reactor Regulation
Attention: Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch No. 3
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Proposed Change to Environmental Technical Specifications
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

- Reference: 1) Letter from J. M. Pilant to T. A. Ippolito Dated July 11, 1978, "Proposed Changes to Environmental Technical Specifications"
- 2) Letter from T. A. Ippolito to J. M. Pilant Dated March 9, 1979, "Amendment 54 to the Facility Operating License - Delete Requirements for Thermal Mixing Zone Limits and the Associated Monitoring Program"
- 3) Letter from J. M. Pilant to B. K. Grimes Dated May 25, 1979, "Radiological Effluent Technical Specifications"

Dear Mr. Ippolito:

Reference 1 requested, among other things, that the Radiological Sampling Stations identified in Section 4.4 of the Environmental Technical Specifications be amended. As agreed upon by the District, Reference 2 issued changes to the Technical Specifications for certain items in Reference 1 but did not change the Radiological Sampling Stations requested.

As defined in Attachment 1, circumstances since the submittal of Reference 1 require that Nebraska Public Power District once again request that the Radiological Sampling Stations be amended as identified in Attachments 1 and 2. It should be noted that some of the revised pages in Attachment 2 were also revised in our Reference 1 request.

These proposed changes have been reviewed by appropriate District personnel who have concluded that the changes are not detrimental to the health and safety of the public, nor do they constitute an unreviewed safety question.

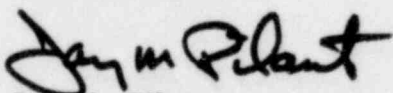
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Once again, the District would like to indicate disagreement with the imposition of a Class II amendment fee relative to changes in sampling station locations. These changes which have occurred on several occasions in the past are neither under the the control of the District nor the NRC. The District has previously proposed that changes to the sampling stations necessitated by factors beyond the control of the District be routinely made and subsequently reported as part of the Annual Operating Report. It is our understanding that the Commission's legal staff had objections to such action and the matter was not pursued further. Since this alternate method for resolution of this issue has not been accepted, the District requests that the Class II fee in the amount of \$1,200 submitted with Reference 1 for Sampling Station changes be refunded since that request was not acted upon. Nebraska Public Power District also respectfully requests that the Sampling Station changes requested in Reference 1 and this submittal be either 1) routinely changed in the Environmental Technical Specifications with the next License Amendment, or 2) folded into the review of our Radiological Effluent (Appendix I) Technical Specifications submitted in Reference 3. Payment in the amount of \$4,000 was provided in Reference 3 as payment for the Class III amendment.

Should you have any questions or require additional information, please contact me.

In addition to three signed originals, 37 copies are also submitted for your use.

Sincerely yours,



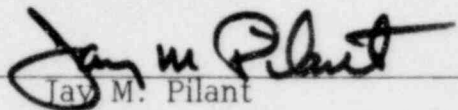
Jay M. Pilant
Director of Licensing
and Quality Assurance

JMP/jdw:bn8/1
Attachment

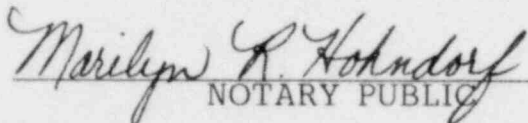
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STATE OF NEBRASKA)
) ss
PLATTE COUNTY)

Jay M. Pilant, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to execute this request on behalf of Nebraska Public Power District; and that the statements in said application are true to the best of his knowledge and belief.


Jay M. Pilant

Subscribed in my presence and sworn to before me this 8th day of May.


NOTARY PUBLIC

My Commission expires Oct. 14, 1980.

