



Nebraska Public Power District

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NLS9000209
June 1, 1990

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Proposed Change No. 80 to Technical
Specifications
Definition of Surveillance Frequency
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

In accordance with the applicable provisions specified in 10CFR50, Nebraska Public Power District proposes the attached changes to Section 1.0 "Definitions" of the Cooper Nuclear Station Technical Specifications. The proposed change will revise the existing definition of "Surveillance Frequency" by allowing the extension of specified surveillance intervals by 25 percent without limiting such extension to 3.25 times the specified interval for (three) 3 consecutive intervals. This proposed change is an NRC recommended line-item improvement and is made in accordance with the guidance of NRC Generic Letter 89-14 of August 21, 1989.

The Attachment contains a description of the proposed change, the attendant 10CFR50.92 evaluation, and the applicable revised Technical Specification page. This proposed change has been reviewed by the necessary Safety Review Committees and incorporates all amendments to the CNS Facility Operating License through Amendment 133 issued April 12, 1990.

In addition to the signed original, 37 copies are also submitted for your use. By copy of this letter and attachment the appropriate State of Nebraska official is being notified in accordance with 10CFR50.91(B) (1). Copies to the NRC Region IV Office and the CNS Resident Inspector are also being sent in accordance with 10CFR50.4(b) (2).

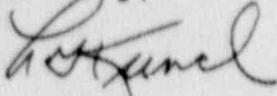
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Page 2
June 1, 1990

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

Sincerely,



L. G. Kuncl
Nuclear Power Group Manager

LGK:dmr 8506
Attachment

cc: H. R. Borchert
Department of Health
State of Nebraska

NRC Regional Office
Region IV
Arlington, TX

NRC Resident Inspector Office
Cooper Nuclear Station

Revised Technical Specification Page
Definition of Surveillance Frequency
Cooper Nuclear Station

Revised Page: 5a

Present Cooper Nuclear Station (CNS) Technical Specifications, in Section 1.0.Y "Surveillance Frequency", limits the combined time interval for any three consecutive surveillance intervals to no more than 3.25 times the specified surveillance interval. The 3.25 limit is used in conjunction with another limit specified in Section 1.0.Y of the CNS Technical Specifications that permits surveillance intervals to be extended up to 25 percent of the specified interval. Per Generic Letter 89-14, the intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

In Generic Letter 89-14, the NRC encouraged licensees and applicants to propose changes to their plant Technical Specifications to remove the 3.25 limitation using the provided guidance. A safety benefit can be realized by applying the 25 percent to surveillance intervals without the limitation imposed by the three consecutive interval requirement. The safety benefit results when a surveillance interval is extended around plant conditions that could be unsuitable for performing the surveillance or maintenance activities. Examples of unsuitable plant conditions include transient plant operating conditions or conditions involving safety systems being out of service for surveillance or maintenance activities. Also, there is the administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit.

The District requests to revise the CNS Technical Specifications to implement the recommended actions of Generic Letter 89-14. The proposed changes are consistent with the guidance of the generic letter in that they:

- 1). Delete the 3.25 limitation in Specification 1.0.Y on Page 5a.
- 2). Utilize the exact, suggested wording of the generic letter in Specification 1.0.Y for the 25 percent surveillance allowance.
- 3). Incorporate the suggested bases of the generic letter into the body of Specification 1.0.Y, since the CNS Technical Specifications do not use the Standard Technical Specification format and have no comparable bases section.

Evaluation of This Revision with Respect to 10CFR50.92

The enclosed Technical Specification change is judged to involve no significant hazards based on the following:

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

Evaluation:

The proposed amendment would remove from the plant Technical Specifications the limit on the combined time interval for any three consecutive surveillance intervals to not exceed 3.25 times the specified surveillance interval. Removal of this 3.25 limit on surveillance extension does not

involve a physical change or alteration to any plant component or system which could cause the probability of an accident or transient to increase.

Plant Technical Specifications will continue to limit the extension of surveillance intervals by no more than 25 percent of the intervals. This 25 percent allowance can realize a safety benefit by permitting surveillance intervals to be extended at times when plant conditions may not be suitable for performing that surveillance such as transient plant operating conditions or equipment being out of service for on going surveillance or maintenance. In such cases the safety benefit obtained by use of the 25 percent allowance for extending the surveillance interval would not be restricted by the 3.25 limit which is being removed by this license amendment.

Existing equipment surveillance requirements are not affected by this license amendment and the extension of surveillance intervals will continue to be limited by the allowable 25 percent extension limit discussed above. The equipment on which the surveillances are being performed will continue to be proven operable and will continue to be available to respond to and mitigate any previously evaluated transients or accidents.

For the reason above, the proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Evaluation:

The proposed license amendment does not change the plant equipment configuration or operation and is administrative in nature. The proposed license amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Evaluation:

The proposed amendment would remove from the plant Technical Specifications the limit on the combined time interval for any three consecutive surveillance intervals to not exceed 3.25 times the specified surveillance interval. Surveillance intervals will continue to be constrained by the 25 percent extension limitation retained in the plant Technical Specifications. This surveillance limitation is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the surveillance requirements. Removal of the 3.25 limit will allow more flexibility in the performance of equipment surveillance around certain plant conditions that may present increased likelihood of unnecessary transients or challenges to safety systems. The proposed license amendment does not change any plant operating setpoint or limiting plant safety system setting and does not involve a significant reduction in the margin of safety.