



# Nebraska Public Power District

COOPER NUCLEAR STATION  
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NSD940383  
April 12, 1994

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

Subject: Proposed Change No. 117 to Technical Specifications  
10 CFR Part 20 Implementation  
Cooper Nuclear Station  
NRC Docket No. 50-298, DPR-46

Reference: Letter (No. NSD930758) from G. R. Horn (NPPD) to U.S. NRC Document Control Desk dated June 14, 1993, "Proposed Change No. 117 to the Cooper Nuclear Station Technical Specifications; 10 CFR Part 20 Implementation"

Gentlemen:

In the above reference, the Nebraska Public Power District (District) submitted a proposed change to the Cooper Nuclear Station (CNS) Technical Specifications that would revise those portions of the Technical Specifications impacted by the implementation of the revised 10 CFR 20. During subsequent NRC review of this application, the NRC suggested that the District revise this proposed change to 1) remove proposed definitions which are redundant to 10 CFR 20, and 2) reference 10 CFR Part 20.1302 as opposed the proposed reference to 10 CFR Part 20, Appendix B, pertaining to the Limiting Condition for Operation (LCO) controlling liquid effluent concentrations.

This revision to Proposed Change No. 117 is based on discussions between the NRC and the District held on December 6th and 7th, 1993 where the primary concern centered around a proposed wording change to LCO 3.21.B.1.a of the CNS Technical Specifications. The District had originally proposed to substitute the term "10 CFR Part 20.106" with the term "10 CFR 20, Appendix B, Table 2, annual averaged concentrations". During this discussion it was agreed that the CNS licensing basis, as given in the Radiological Effluents Technical Specifications (RETS) issued per CNS License Amendment No. 89, allowed for the averaging of release rates over one year. However, it was also agreed that release rates could be averaged over a month. This averaging is currently specified in Surveillance Requirement 4.21.B.1.b and would be retained by revising LCO 3.21.B.1.a to reference 10 CFR Part 20.1302 in place of the current reference of 10 CFR Part 20.106.

During this discussion, the NRC also noted that the District had included definitions that are contained in the revised Part 20. Inclusion of these definitions were considered unnecessary and could result in the need to process a future Technical Specification change should the subject definitions change. The District agreed to remove these definitions.

As a result of the above summarized discussion, the following three specific revisions to Proposed Change No. 117 are submitted for NRC review:

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April 12, 1994

<u>Page No.</u>	<u>Description of Changes Subsequent to Submittal of the Reference</u>
5a & 5c	These pages are being submitted to reflect the removal of Definitions 1.0.Z.B.1 - 5. These definitions pertain to the revised Part 20 terms "Controlled Area, Occupational Dose, Restricted Area, Unrestricted Area, and Site Boundary". Due to these changes, Page 5c is no longer affected by Proposed Change No. 117.
216a21	This page is being resubmitted to reflect a change to LCO 3.21.B.1.a (Line 5) regarding the reference to 10 CFR Part 20.106. The proposed reference is 10 CFR Part 20.1302. The District had originally proposed the term "10 CFR 20, Appendix B, Table 2, annual averaged concentrations."
216x	This page is being resubmitted to reflect a change to Paragraphs 1, 4, 5 and 6 (Lines 6, 3, 8 and 2 respectively) regarding the reference to 10 CFR Part 20.106. The proposed reference is 10 CFR Part 20.1302. The District had originally proposed the term "10 CFR 20, Appendix B, Table 2, annual averaged concentrations" and references to 10 CFR Part 20, Appendix B, Table 2.

Both the affected revised pages and the corresponding marked-up pages are attached for consideration. This revision to Proposed Change No. 117 has been reviewed by the necessary Safety Review Committees. Due to the fact that the changes, contained in this revision, are minor in nature, the District considers the no significant hazards determination, contained in the reference, to still be valid.

As stated in the reference, the District implemented the revised Part 20 rule on January 1, 1994. For this reason, the District respectfully requests that the approved Technical Specification Change be approved as soon as practical in order to minimize any confusion that could result from implementing the revised Part 20 concurrent with the Technical Specifications referencing the old Part 20 sections.

By copy of this letter and attachment, the appropriate State of Nebraska official is being 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 sent in accordance with 10 CFR 50.4(b)(2).

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

Sincerely,



G. R. Horn  
Vice President - Nuclear

GRH/dnm  
Attachment

U.S. Nuclear Regulatory Commission

Page 3 of 4

April 12, 1994

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

NRC Regional Office  
Region IV  
Arlington, TX

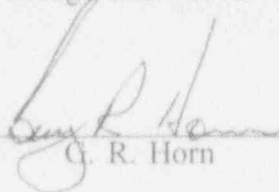
NRC Resident Inspector  
Cooper Nuclear Station

April 12, 1994

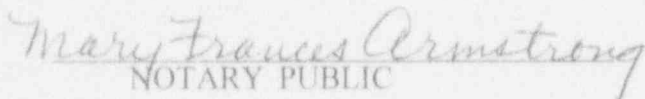
STATE OF NEBRASKA)

NEMAHA COUNTY )

G. R. Horn, 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 submit this request on behalf of Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.

  
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G. R. Horn

Subscribed in my presence and sworn to before me this 12<sup>th</sup> day of April, 1994.

  
NOTARY PUBLIC

