Nebraska Public Power District

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NSD920481
September 9, 1992

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

Subject: Proposed Change No. 110 to Technical Specifications
MSIV Closure Scram and CSCS Instrumentation Bases
Cooper Nuclear Station
NRC Docket No. 50-298, License No. DPR-46

Gentlemen:

This change requests that six administrative corrections be made to the Cooper Nuclear Station Technical Specifications. The first revises Table 3.1.1, Reactor Protection System Instrumentation Requirements, to indicate that the Main Steam Line Isolation Valve Closure Scram is only required while in the RUN mode, and the second adds the bases for the instrumentation settings for the Core Spray and Residual Heat Removal Systems in the Core Standby Cooling System Bases section. These changes are needed to correct omissions from the proposed Technical Specifications changes submitted to support the implementation of the Low Low Set modifications, which were later implemented by Amendment Number 83.

The District also proposes administrative changes regarding the use of the terms "Reactor Equipment Cooling system" and "Emergency Filter system", and a clarification that only one Control Room emergency bypass fan exists in the Emergency Filter system. The balance of administrative changes correct typographical errors.

The attachment contains a detailed description of the proposed change, the attendant 10 CFR 50.92 evaluation, and the CNS Technical Specifications pages revised by this change. This proposed change has been reviewed by the necessary Safety Review Committees and incorporates all amendments to the CNS Facility Operating License through Amendment 153 issued August 12, 1992.

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 provided in accordance with 10 CFR 50.4(b)(1).

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

Sincerely,

G. R. Horn
Nuclear Power Group Manager

GRH/MAD/dnm
Attachments

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

NRC Regional Office
Region IV
Arlington, TX

NRC Resident Inspector
Cooper Nuclear Station

STATE OF NEBRASKA)
)
PLATTE 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.

G. R. Horn

Subscribed in my presence and sworn to before me this 9th day of September, 1992.

NOTARY PUBLIC

GENERAL NOTARY State of Nebraska
ALOIS J. HUBL
My Comm. Exp. Aug. 21, 1995

COOPER NUCLEAR STATION
TECHNICAL SPECIFICATIONS PROPOSED CHANGE NO. 110
MSIV Closure Scram and CSCS Instrumentation Bases

Revised Pages

iii	29	48	63
78	85	87	206
209a	215	215a	215d
	215e	215f	

1.0. Introduction.

The Nebraska Public Power District (District) requests that Table 3.1.1, Reactor Protection System Instrumentation Requirements, be revised to indicate that the Main Steam Line Isolation Valve (MSIV) Closure trip is only required while the plant is in the RUN mode of operation, and that the bases for the instrument settings for the Core Spray and the Low Pressure Coolant Injection (LPCI) mode of the Residual Heat Removal (RHR) systems be added to the Bases section for the Core Standby Cooling System (CSCS).

The District also proposes a change to LCO 3.12.A.2.c to clarify that only one emergency bypass fan exists in the Control Room Emergency Filter system, to update the page reference and correct a typographical error on Page iii. Minor editorial changes and typographical error corrections are also proposed for Pages 48, 63, 78, 87, 206, 209a, 215, 215a, 215d, 215e, and 215f to improve the clarity of these pages.

2.0. Basis for Change.

2.1. Amendment Number 83 implemented the changes to the CNS Technical Specifications needed for the implementation of the plant modification which added the Low Low Set function to the safety relief valves. The subject plant modification is described in District letter to the NRC (No. LQA8200034), dated December 17, 1982, and supplemented by District letter to the NRC (No. LQA8300088), dated February 15, 1983. During a recent operator licensing examination, it was noted that these changes failed to include the modification performed to the circuitry which bypasses the MSIV Closure trip when the reactor mode selector switch is not in the RUN mode. Formerly, this trip was applicable when the mode selector switch was also in the STARTUP position, with bypass controlled by four pressure switches. The function of these pressure switches was reassigned to the Low Low Set function by the Low Low Set plant modification, and the MSIV Closure trip circuitry in the STARTUP mode eliminated. However, Table 3.1.1 was not updated to reflect the changes to the MSIV Closure trip circuitry which were approved by Amendment Number 83.

2.2. The Technical Specifications, upon implementation of Amendment Number 83, also required a Bases section for the new Low Low Set instrumentation. The District submitted proposed changes for the Bases

for the CSCS instrumentation to include a Bases for the Low Low Set instrument settings. However, those proposed changes, which were implemented by Amendment Number 83, inadvertently indicated that the settings for the Core Spray and RHR (LPCI mode) system instruments had "No Basis."

In view of the importance that 10CFR50.59 places upon the Bases of Technical Specifications, appropriate Bases for the Core Spray and RHR system instrumentation should be added. The District proposes that the Bases for the instrument tables for these two systems reference Updated Safety Analysis Report (USAR) Section VII-4, which describes the Core Spray and RHR (LPCI mode) system initiating and control instrument settings, and that operation of the systems ensures that fuel cladding temperatures will not exceed 2200°F during design basis loss of coolant accidents.

3.0. Description of Proposed Changes.

3.1 On Page 29, the District proposes that Table 3.1.1, Reactor Protection System Instrumentation Requirements, be revised by deleting the "X" and its associated footnotes indicating that the MSIV closure trip is applicable while the plant is in the STARTUP mode. The table would then indicate that this trip is applicable only when the mode selector switch is in the RUN position.

3.2 On Page 85, the District proposes to add the following Bases for the Core Spray and RHR (LPCI mode) instrument settings:

" CORE SPRAY

Initiation and control instrumentation settings ensure that the Core Spray system operates to ensure that peak fuel element cladding temperatures do not exceed 2200°F during a design basis LOCA. The basis for the settings is discussed in USAR Section VII-4.

RESIDUAL HEAT REMOVAL (LPCI MODE)

Initiation and control instrumentation settings ensure that the LPCI mode of the Residual Heat Removal system operates to ensure that peak fuel element cladding temperatures do not exceed 2200°F during a design basis LOCA. High drywell pressure and reactor water level instrumentation also allow injection water to be diverted for containment spray. The basis for the settings is discussed in USAR Section VII-4."

3.3 On Pages 215 and 215f, the District proposes to replace the term "Reactor Building Closed Cooling Water System" with the term "Reactor Equipment Cooling System". This proposed change simply clarifies the existing Technical Specification requirements by utilizing the new term that is consistent with Amendment Number 152.

3.4 On Pages iii, 48, 63, 78, 87 206, 209a, 215, 215a, 215d, and 215e, the District proposes to replace the terms "Main Control Room Ventilation Isolation System", "Main Control Room Ventilation System", and "Control Room Air Treatment System" with the term "Control Room Emergency Filter System ". This proposed change simply clarifies the existing Technical Specification requirements through the use of a single term that is consistent with the system descriptions given in CNS USAR Section X-10.3.6.5 and Standard Technical Specifications. This change is considered to be purely editorial.

3.5 On Page 215a, the District proposes to revise LCO 3.12.A.2.c to clearly identify that this LCO is applicable to the emergency bypass fan, as opposed to each fan. This change is necessary to correct for an error which implied that more than one fan exists, and to correctly reflect the current configuration of the plant. There are no changes to the configuration of the Control Room Emergency Filter system associated with this proposed change. This change is considered to be purely editorial.

3.6 On Page iii, the District proposes to change a page reference pertaining to Section 3.12.A, and move the subsection headings, associated with Section 5.0, to their proper location. On Page 48, parenthesis are removed from LCO 3.2.D.5.b. On Page 63, the term "Isolation (4)" is moved under the first column and parenthesis are removed from the term "RMV-RM-1". On Page 78, the comma is removed from the term "RMP-RM-251 A, B, C & D". On Page 206, a Surveillance Requirement is renumbered from "3.10" to "4.10". On Page 215a, Surveillance Requirement 4.12.A.2.d is appropriately numbered, the referenced specification is changed to "3.12.A.3" in LCO 3.12.A.1, and in LCO 3.12.A.3, the spelling of "succeeding" is corrected . On Page 215f, the term "Service Water" is capitalized. Finally, to improve clarity, all of the LCOs under 3.12.A and the associated surveillance requirements under 4.12A are moved to Page 215a. A portion of BASES, 3.12.C is moved from Page 215e to Page 215d. These changes are considered to be purely editorial.

3.7 As an administrative note, Pages 29 and 78 are also subject to revision by Proposed Technical Specifications Change Number 100.

4.0. Significant Hazards Determination.

10 CFR 50.91(a)(1) requires that licensee requests for operating license amendments be accompanied by an evaluation of significant hazards posed by the issuance of the amendment. This evaluation is performed with respect to the criteria given in 10 CFR 50.92(c).

4.1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes correct administrative errors and do not change the design or operation of the nuclear facility. The proposed change to Table 3.1.1 to note that the Main Steam Isolation Valve (MSIV) Closure trip is only required while in the RUN mode will make the table consistent with the plant modifications previously approved by Amendment

Number 83. The proposed change to the Core Spray and Residual Heat Removal (Low Pressure Coolant Injection mode) system instrumentation bases will refer to the previously approved basis for the instrument settings. The proposed change to LCO 3.12.A.2.c simply clarifies that only one emergency bypass fan exists, which reflects the current configuration of the plant.

4.2. The proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes correct administrative errors and do not modify the design of the nuclear facility or create any new mode of plant operation. The proposed change to Table 3.1.1 to specify that the MSIV Closure trip is only required during the RUN mode will make the table consistent with the plant modifications previously evaluated and approved by Amendment Number 83. The proposed change to the instrument bases section does not make any changes to the plant instruments or their settings as it only refers to the Updated Safety Analysis Report (USAR) section for the basis of the instrument settings. The proposed change to LCO 3.12.A.2.c is editorial in nature, and simply reflects the current configuration of the plant.

4.3. The proposed changes will not create a significant reduction in the margin of safety. The proposed changes correct administrative errors and do not modify the design or operation of the nuclear facility. The proposed change to Table 3.1.1 reflects the plant modifications approved by Amendment Number 83. The proposed change to the instrumentation bases section will refer to the USAR section which contains the bases for the instrument settings for the Core Spray and Residual Heat Removal (Low Pressure Coolant Injection mode) systems, and does not change any current settings. The proposed change to LCO 3.12.A.2.c is editorial in nature, and simply reflects the current configuration of the plant.

5.0. Conclusion.

The District has evaluated the proposed changes described above against the criteria of 10 CFR 50.92(c) in accordance with the requirements of 10 CFR 50.91(a)(1). This evaluation has determined that Proposed Change Number 110 to Technical Specifications will not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility for a new or different kind of accident from any accident previously evaluated, or (3) create a significant reduction in the margin of safety. Therefore, the District requests NRC approval of Proposed Change Number 110.