

Nebraska Public Power District

GENERAL OFFICE
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NLS8500221

August 21, 1985

Office of Nuclear Reactor Regulation
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief

Dear Mr. Vassallo:

Subject: Revision to Proposed Change No. 22 to Technical
Specifications
Halon Fire Suppression System
Cooper Nuclear Station
NRC Docket No. 50-298, DPR-46

In accordance with the applicable provisions specified in 10CFR50, Nebraska Public Power District submitted Proposed Change No. 22 to the Technical Specifications for review and approval. However, installation and layout of the Halon system has revealed the need to eliminate the proposed requirement that the storage tanks be periodically weighed to verify Halon content. It is the District's belief that the breaking and uniting of joints required to allow weighing of the tanks, combined with the restricted quarters present to perform this task, will be detrimental to the system's piping integrity and its ability to perform its intended function. As an alternative, the District proposes to verify Halon content by the measurement of Halon level in the tank using the factory installed dipstick arrangement for each tank. The proposed requirement to conduct a "Puff Test" to verify no blockage in the discharge nozzles will also necessitate breaking the mechanical integrity of the system, hence compromising system operability as described above. The District proposes to perform a visual and tactile inspection of the nozzles, as an equivalent alternative to protect the functionality of the system. Accordingly, three revised proposed Technical Specification pages are enclosed.

The Halon 1301 system was functionally tested and discharged on May 3, 1985, with satisfactory results. The test was conducted in conformance with the standard test criteria prescribed by the National Fire Protection Association (NFPA) Code 12A regarding Total Flooding Areas.

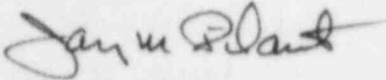
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Mr. Domenic B. Vassallo
Page 2
August 21, 1985

In addition to three signed originals, 40 copies are submitted for your use.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jay M. Pilant".

Jay M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP/grs:emz21/4
Enclosure

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