



October 9, 1978

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, D.C. 20555

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

Dear Mr. Ippolito:

In accordance with the provisions specified in 10CFR50.90, the Nebraska Public Power District requests that the Radiological Technical Specifications for Cooper Nuclear Station be revised to incorporate the following proposed changes.

Copies of the revised Technical Specification pages are attached with the changes marked.

1. Tables 3.2.A (Page 1) and 4.2.A (Page 1). Primary Containment and Reactor Vessel Isolation

The Temperature Indicating Switch (RWCU-TIS-99) should be deleted from these tables. The function of this instrument is to provide for process control rather than aid in providing primary containment isolation. As described in the Safety Analysis Report, Volume II, Section IV-9.3, the function of this switch is to isolate the filter demineralizer units upon high inlet temperature to prevent damage to the ion exchange resins. Additionally, monthly testing of this instrument requires isolation of the RWCU system. This results in thermal cycles on the system and the possibility of accelerating stress corrosion problems.

2. Section 6.3.8. Emergency Plan Drills

This change is submitted to resolve differences between the Technical Specification which specifies that Emergency Plan drills be conducted semi-annually, and Amendment 47 to the Cooper Nuclear Station Final Safety Analysis Report (Emergency Plan) and Regulatory Guide 1.101, Revision 1 which allow annual Emergency Plan drills. It is felt that one drill per year is sufficient to meet the recommendations of the Regulatory Guide and the intent of the FSAR.

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3. Figure 6.1.2. Cooper Nuclear Station Organization Chart

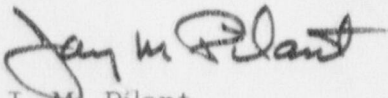
A letter dated July 26, 1978 from G. L. Madsen (NRC) to NPPD reported the results of a routine inspection conducted at Cooper Nuclear Station July 11-14, 1978. Section 5 of this report noted that while Technical Specification Figure 6.1.2 indicates a Reliability Engineer assigned to the Station Superintendent's staff, the actual site organization included a Technical Assistant to the Station Superintendent. Figure 6.1.2 is being revised to reflect the present station organization. One item revised on Figure 6.1.2 is the Station Operators (unlicensed) from two per shift to three per shift. Technical Specification 6.1.3.F is also being revised to agree with the figure in this regard. Three unlicensed operators are presently required for a fire brigade in Technical Specification 6.1.3.G.

The safety significance of these proposed changes has been reviewed by appropriate District personnel, and under 10CFR Part 170, these changes are judged to be a Class II amendment. Payment in the amount of \$1,200 is enclosed with this submittal.

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

In addition to three signed originals, 37 copies of the proposed changes are also submitted.

Sincerely yours,



J. M. Pilant  
Director of Licensing  
and Quality Assurance

JMP/jw:srs3/5  
Attachments



COOPER NUCLEAR STATION  
TABLE 3.2.A (Page 1)  
PRIMARY CONTAINMENT AND REACTOR VESSEL ISOLATION INSTRUMENTATION

Instrument	Instrument I.D. No.	Setting Limit	Minimum Number of Operable Components Per Trip System (1)	Action Required When Component Operability is Not Assured (2)
Main Steam Line High Rad.	RMP-RM-25i, A,B,C,&D	< 3 Times Full Power	2	A or B
Reactor Low Water Level	NBI-LIS-101, A,B,C,&D	>+12.5" Indicated Level	2(4)	A or B
Reactor Low Low Water Level	NBI-LIS-57 A & B NBI-LIS-58 A & B	>-37" Indicated Level	2	A or B
Main Steam Line Leak Detection	MS-TS-121, A,B,C,&D 122, 123, 124, 143, 144, 145, 146, 147, 148, 149, 150	< 200°F	2(6)	B
Main Steam Line High Flow	MS-dPIS-116 A,B,C,&D 117, 118, 119	< 140% of Rated Steam Flow	2(3)	B
Main Steam Line Low Pressure	MS-PS-134 A,B,C,&D	> 850 psig	2(5)	B
High Drywell Pressure	PC-PS-12, A,B,C,&D	< 2 psig	2(4)	A or B
High Reactor Pressure	RR-PS-128 A & B	< 75 psig	1	D
Main Condenser Low Vacuum	MS-PS-103 A,B,C,&D	> 7" Hg (7)	2	A or B
Reactor Water Cleanup System High Flow	RWCU-dPIS-170 A & B	< 200% of System Flow	1	C

COOPER NUCLEAR STATION  
 TABLE 4.2.A (Page 1)  
 PRIMARY CONTAINMENT AND REACTOR VESSEL ISOLATION SYSTEM  
 TEST AND CALIBRATION FREQUENCIES

Item	Item I.D. No.	Function Test Freq.	Calibration Freq.	Instrument Check
<u>Instrument Channels</u>				
Reactor Low Water Level	NBI-LIS-101, A,B,C,&D	Once/Month (1)	Once/3 Months	Once/Day
Reactor Low Low Water Level	NBI-LIS-57, A & B NBI-LIS-58, A & B	Once/Month (1)	Once/3 Months	Once/Day
Main Steam Line Leak Detection	MS-TE-121, A,B,C,&D 122, 123, 124, 143, 144, 145, 146, 147, 148, 149, 150	Once/Month (1)	Once/Operating Cycle	None
Main Steam Line High Flow	MS-dPIS-116, A,B,C,&D 117 118 119	Once/Month (1) Once/Month (1) Once/Month (1) Once/Month (1)	Once/3 Months Once/3 Months Once/3 Months Once/3 Months	None None None None
Main Steam Line Low Press.	MS-PS-134, A,B,C,&D	Once/Month (1)	Once/3 Months	None
High Reactor Pressure	RR-PS-128, A & B	Once/Month (1)	Once/3 Months	None
Condenser Low Vacuum	MS-PS-103, A,B,C,&D	Once/Month (1)	Once/3 Months	None
Reactor Water C.U. High Flow	RWCU-dPIS-170, A & B	Once/Month (1)	Once/3 Months	None
Reactor Water C.U. High Space Temp.	RWCU-TS-150 A-D, 151, 152, 153, 154, 155, 156, 157, 158, 159, RWCU-TS-81 A,B,E,F, RWCU-TS-81 C,D,G,H	Once/Month (1)	Once/Operating Cycle	None

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization

6.1.1 The Station Superintendent shall have the over-all fulltime onsite responsibility for the safe operation of the Cooper Nuclear Station. During periods when the Station Superintendent is unavailable, he may delegate his responsibility to the Assistant to Station Superintendent or, in his absence, to one of the Department Supervisors.

6.1.2 The portion of the Nebraska Public Power District management which relates to the operation of this station is shown in Figure 6.1.1.

6.1.3 The organization for conduct of operation of the station is shown in Fig. 6.1.2. The shift complement at the station shall at all times meet the following requirements. Note: Higher grade licensed operators may take the place of lower grade licensed or unlicensed operators.

- A. A licensed senior reactor operator (SRO) shall be present at the station at all times when there is any fuel in the reactor.
- B. A licensed reactor operator shall be in the control room at all times when there is any fuel in the reactor.
- C. Two licensed reactor operators shall be in the control room during all startup, shutdown and other periods involving significant planned control rod manipulations. A licensed SRO shall either be in the Control Room or immediately available to the Control Room during such periods.
- D. A licensed senior reactor operator (SRO) with no other concurrent duties shall be directly in charge of any refueling operation, or alteration of the reactor core.

A licensed reactor operator (RO) with no other concurrent duties shall be directly in charge of operations involving the handling of irradiated fuel other than refueling or reactor core alteration operations.

- E. An individual who has been trained and qualified in health physics techniques shall be on site at all times that fuel is on site.
- F. Minimum crew size during reactor operation shall consist of three licensed reactor operators (one of whom shall be licensed SRO) and three unlicensed operators. Minimum crew size during reactor cold shutdown conditions shall consist of two licensed reactor operators (one of whom shall be licensed SRO) and one unlicensed operator.

In the event that any member of a minimum shift crew is absent or incapacitated due to illness or injury a qualified replacement shall be designated to report on-site within two hours.

- G. A fire brigade of at least 3 members shall be maintained at all times. This excludes the 3 members of the minimum shift crew necessary for safe shutdowns, and other personnel required for other essential functions during a fire emergency.

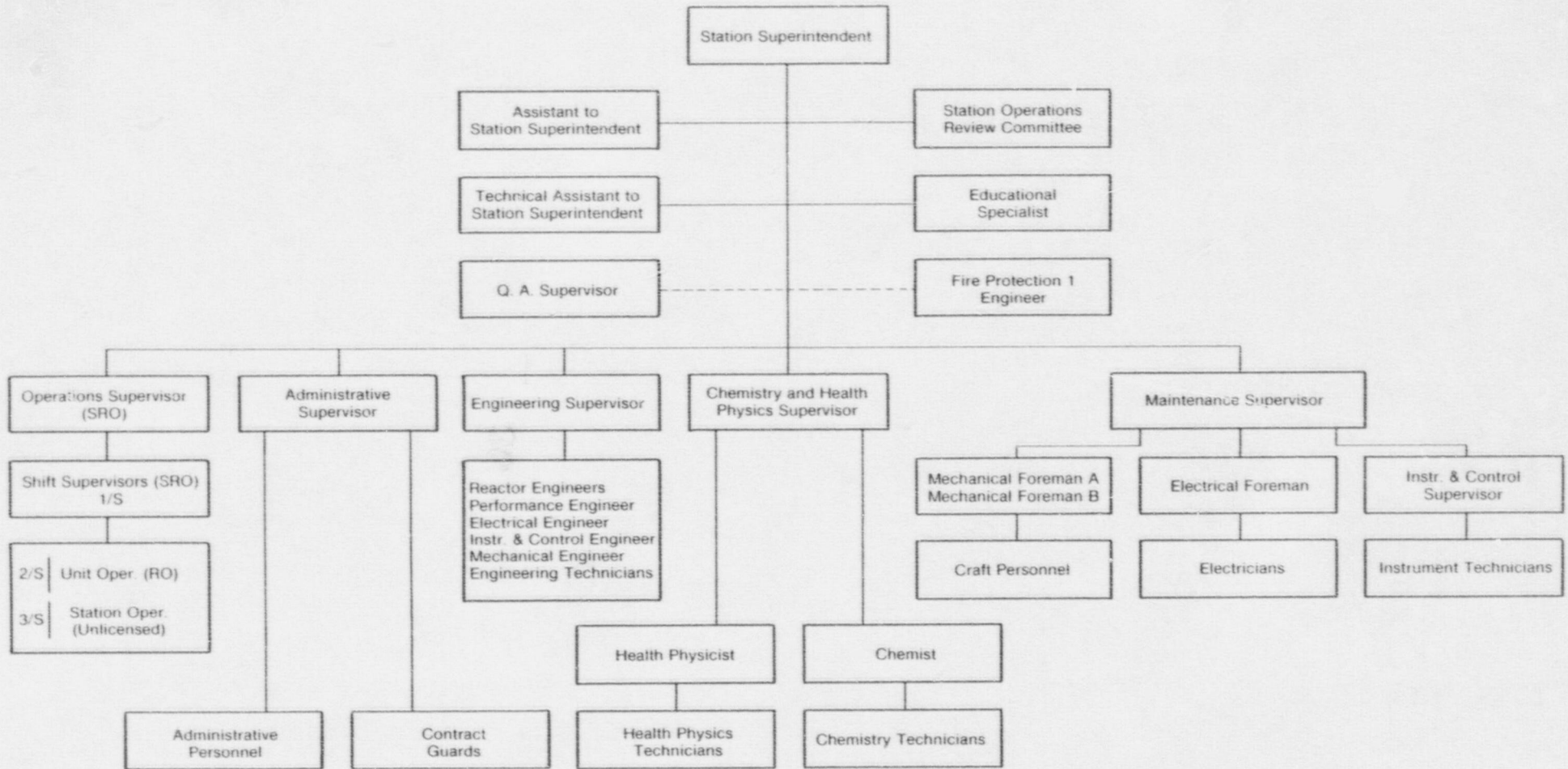
6.3 (cont'd.)

- 6.3.5 In lieu of the "control device" or "alarm signal" required by Paragraph 20.203 (c) (2) of 10 CFR 20 each High Radiation Area (100 mrem/hr or greater) shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by requiring notification and permission of the shift supervisor. Any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.
- 6.3.6 All procedures described in 6.3.2, 6.3.3, & 6.3.4 above, and changes thereto, shall be reviewed by the Station Operations Review Committee and approved by the Station Superintendent prior to implementation, except as provided for in 6.3.7 below.
- 6.3.7 Temporary changes to procedures which do not change the intent of the original procedure may be made, provided such changes are approved by two members of the operating staff holding SRO licenses. Such changes shall be documented and subsequently reviewed by the Station Superintendent within one month.
- 6.3.8 Drills of the Emergency Plan procedures shall be conducted annually, including a check of communications with offsite support groups. Drills on the procedures specified in 6.3.2.A, B, and C above shall be conducted as part of the retraining program.

REFERENCE

1. SAR Subsection XIII-6.

### CNS ORGANIZATION CHART



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1/S one/shift  
 2/S two/shift  
 3/S three/shift  
 RO-NRC Reactor Operators License  
 SRO-NRC Senior Reactor Operators License  
 1-Functional Position Only  
 physically located in General Office

Figure 6. 1. 2  
Cooper Nuclear Station  
Organization Chart