



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS970089
May 2, 1997

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

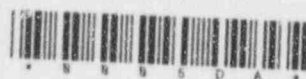
Gentlemen:

Subject: Proposed Change to CNS Technical Specifications
Standby Liquid Control (SLC) System Relief Valves
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

In accordance with the provisions of 10 CFR 50.4 and 50.90 the Nebraska Public Power District (the District) hereby submits a request for an amendment to License DPR-46 to change the Cooper Nuclear Station (CNS) Technical Specifications. The proposed change deletes the SLC relief valve testing described in Technical Specification Section 4.4.A.2.a and its associated Bases in Bases Section 3.4.A since the testing is already performed under the Augmented Testing Program which is a part of the CNS In-Service Testing (IST) Program. This proposed change is also consistent with the Improved Technical Specification (ITS) submittal (NLS970002) dated March 27, 1997.

The proposed Technical Specification is considered to be a compensatory measure to resolve a Nuclear Regulatory Commission (NRC) concern regarding potential reduction in margin of safety and hence, an unreviewed safety question (USQ) with respect to the SLC relief valve operability. It is considered to be an Emergency Technical Specification Change request since CNS will not be able to startup from the current refueling outage with a potential USQ concern unless an amendment to the current CNS operating license is issued prior to startup.

Irrespective of this proposed Technical Specification change request, the District believes that an USQ does not exist because the margin of safety is not reduced by maintaining the SLC relief valve nominal setpoint at 1540 psig \pm 1% per the IST Augmented Testing Program which is much higher than the current CNS Technical Specification minimum pressure requirement. This state of confusion with regard to USQ could have been avoided by transmitting the appropriate supporting documentation after the Anticipated Transient Without Scram (ATWS) rule implementation. As a corrective action to prevent any future ambiguities regarding the USQ on this issue, the District has decided to include the SLC relief valve setpoint at 1540 psig and its basis information in the Updated Safety Analysis Report (USAR) upon the issuance of the CNS license amendment. It will ensure that the future changes to this setpoint fall under the purview of 10 CFR 50.59 regulation.



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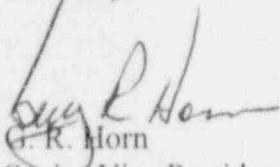
Attachment 1 contains the bases for the change, the no significant hazard consideration determination, and the CNS Technical Specification pages revised by this change. This proposed change has been reviewed by the necessary safety review committees and incorporates all amendments to the CNS Facility Operating License through Amendment 175 issued April 29, 1996.

The District requests that the amendment implementing this proposed Technical Specification change be issued prior to startup from the ongoing 1997 refueling outage at CNS.

By copy of this letter and its 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) (2).

Should you have any questions or require any additional information regarding this submittal, please contact Brad Houston at (402) 825-5819.

Sincerely,


G. R. Horn
Senior Vice President
Of Energy Supply

/gs
Attachment

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

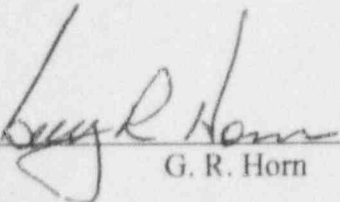
Senior Resident Inspector
USNRC

Environmental Health Division - Program Manager
Nebraska Department of Health

NPG Distribution

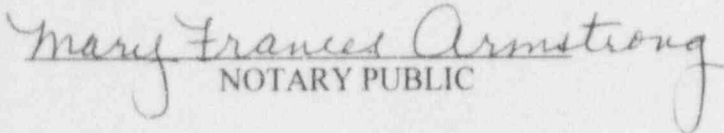
STATE OF NEBRASKA)
)
NEMAHA COUNTY)

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 correspondence 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 2^d day of May, 1997. *mfa*


NOTARY PUBLIC

