



Nebraska Public Power District

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10 CFR 50.90

NLS2026056
September 24, 2026

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

Subject: Supplement to Application to Revise Technical Specifications to Adopt TSTF-585, "Revise LCO 3.0.3 to Require Managing Risk"
Cooper Nuclear Station, Docket 50-298, Renewed License No. DPR-46

Reference: Letter from Khalil Dia, Nebraska Public Power District, to the U.S. Nuclear Regulatory Commission, dated June 17, 2026, "Application to Revise Technical Specifications to Adopt TSTF-585, "Revise LCO 3.0.3 to Require Managing Risk""

The purpose of this letter is for Nebraska Public Power District (NPPD) to respond to an observation discussed by the Nuclear Regulatory Commission during a teleconference held on September 9, 2026, between Nuclear Reactor Regulation (NRR), Division of Licensing Projects 1, Office of Reactor Licensing Branch 3 and NPPD. This teleconference was related to the referenced letter.

The referenced letter requests adoption of TSTF-585, "Revise LCO 3.0.3 to Require Managing Risk," into the Cooper Nuclear Station (CNS) Technical Specifications (TS). TSTF-585 revises Limiting Condition for Operation (LCO) 3.0.3 to require assessing and managing plant risk whenever LCO 3.0.3 is entered. If the risk assessment determines that continuing plant operation is acceptable and other conditions are satisfied, 24 hours from entry into LCO 3.0.3 is permitted to initiate a shutdown. The proposed amendment also revises or adds some TS Required Actions to direct a plant shutdown instead of entry into LCO 3.0.3.

During NRR review of the license amendment request, it was noted that CNS TS LCO 3.6.4.3, Standby Gas Treatment System, Condition D, Required Action D.1 is to enter LCO 3.0.3 immediately. This differs from the Standard Technical Specifications (STS), Revision 5.0, TS 3.6.4.3, which states to be in MODE 3 within 12 hours. This variation was not discussed in the Reference. TSTF-585 is based on STS and with the adoption of TSTF-585, the CNS TS requirement to enter LCO 3.0.3 immediately (which allows up to 24 hours to initiate shutdown provided risk is managed), becomes non-conservative to the STS requirement to be in MODE 3 within 12 hours.

CNS adopted STS in 1998 with Amendment 178 to the CNS custom TS. This amendment was based on STS, Revision 1, which contained the TS LCO 3.6.4.3 requirement to enter LCO 3.0.3 upon entry into Condition D. Condition D has not been revised by any other CNS license change since that time. TSTF-423, "Technical Specifications End States, NEDC-32988-A" was approved by the NRC on March 23, 2006. The TSTF, in part, changed Required Action D.1 from "Enter LCO 3.0.3" immediately to "Be in MODE 3" within 12 hours. As of this date, CNS

has not adopted TSTF-423, therefore, creating the difference noted by NRR between CNS TS and STS, Revision 5.

NPPD agrees with the observation that with the adoption of TSTF-585, the existing CNS TS LCO 3.6.4.3 becomes non-conservative in relation to STS. NPPD proposes revising TS LCO 3.6.4.3, Required Action D.1 to delete "Enter LCO 3.0.3" and replace it with "Be in MODE 3" within a Completion Time of 12 hours and add Condition D.2 to "Be in MODE 4" within a Completion Time of 36 hours. This is consistent with other sections of CNS TS based on not having adopted TSTF-423.

Attachment 1 provides the existing TS page marked to show the proposed change. Attachment 2 provides a revised (clean) TS page. Attachment 3 provides the existing TS Bases page marked to show revised text associated with the proposed TS change and is provided for information only.

The additional information provided in this submittal does not affect the conclusion that the proposed license amendment does not involve a significant hazards consideration. This additional information also does not affect the conclusion that neither an environmental impact statement nor an environmental assessment need be prepared in support of the proposed amendment.

There are no regulatory commitments made in this submittal.

If you should have any questions regarding this submittal, please contact Steve Nelson, Regulatory Affairs and Compliance Manager, at (402) 825-5058.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 9/24/2026
Date

Sincerely,



Khalil Dia
Site Vice President

/dv

Attachments: 1. Proposed Technical Specifications Changes (Mark-Up)
2. Revised Technical Specifications Page
3. Proposed Technical Specifications Bases Changes (Mark-Up) –
For Information Only

cc: Regional Administrator w/ attachments
USNRC - Region IV

Cooper Project Manager w/ attachments
USNRC - NRR Plant Licensing Branch IV

Senior Resident Inspector w/ attachments
USNRC - CNS

Nebraska Health and Human Services w/ attachments
Department of Regulation and Licensure

NPG Distribution w/ attachments

CNS Records w/ attachments

ATTACHMENT 1

Proposed Technical Specifications Changes (Mark-Up)

Cooper Nuclear Station, Docket No. 50-298, Renewed License No. DPR-46

Revised Page

3.6-41

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two SGT subsystems inoperable in MODE 1, 2, or 3.	D.1 Enter LCO 3.0.3 Be in MODE 3. <u>AND</u> D.2 Be in MODE 4.	Immediately 12 hours 36 hours
E. Two SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	E.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.4.3.1 Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2 Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4 Verify the SGT units cross tie damper is in the correct position, and each SGT room air supply check valve and SGT dilution air shutoff valve can be opened.	In accordance with the Surveillance Frequency Control Program

ATTACHMENT 2

Revised Technical Specifications Page

Cooper Nuclear Station, Docket No. 50-298, Renewed License No. DPR-46

Revised Page

3.6-41

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two SGT subsystems inoperable in MODE 1, 2, or 3.	D.1 Be in MODE 3.	12 hours
	<u>AND</u> D.2 Be in MODE 4.	36 hours
E. Two SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	E.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.4	Verify the SGT units cross tie damper is in the correct position, and each SGT room air supply check valve and SGT dilution air shutoff valve can be opened.	In accordance with the Surveillance Frequency Control Program

ATTACHMENT 3

Proposed Technical Specifications Bases Changes (Mark-up) – For Information Only

Cooper Nuclear Station, Docket No. 50-298, Renewed License No. DPR-46

Revised Page

B 3.6-88

BASES

ACTIONS (continued)

C.1 and C.2

During movement of recently irradiated fuel assemblies, in the secondary containment, when Required Action A.1 cannot be completed within the required Completion Time, the OPERABLE SGT subsystem should immediately be placed in operation. This action ensures that the remaining subsystem is OPERABLE, that no failures that could prevent automatic actuation have occurred, and that any other failure would be readily detected.

An alternative to Required Action C.1 is to immediately suspend activities that represent a potential for releasing a significant amount of radioactive material to the secondary containment, thus placing the plant in a condition that minimizes risk. If applicable, movement of recently irradiated fuel assemblies must immediately be suspended. Suspension of these activities must not preclude completion of movement of a component to a safe position.

Required Actions of Condition C have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving recently irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

D.1

If both SGTS subsystems are inoperable in MODE 1, 2, or 3, the SGT system may not be capable of supporting the required radioactivity release control function. ~~Therefore, actions are required to enter LCO 3.0.3 immediately.~~ If one SGTS subsystem cannot be restored to OPERABLE status within the required Completion time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.