



Nebraska Public Power District

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10 CFR 50.90

NLS2026047
September 24, 2026

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

Subject: License Amendment Request to Relocate Technical Specifications Unit Staff Qualification Requirements to the Cooper Nuclear Station Quality Assurance Program for Operation – Policy Document
Cooper Nuclear Station, Docket 50-298, Renewed License No. DPR-46

Pursuant to 10 CFR 50.90, Nebraska Public Power District (NPPD) is submitting a request for an amendment to the Technical Specifications (TS) for Cooper Nuclear Station (CNS).

The proposed change will amend the CNS TS 5.3.1 by relocating requirements related to Unit Staff Qualifications to the CNS Quality Assurance Program for Operation – Policy Document (QAPD) consistent with the Nuclear Regulatory Commission (NRC) Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," guidance.

Attachment 1 provides a description and assessment of the proposed change. Attachment 2 provides the existing TS page marked up to show the proposed change. Attachment 3 provides a revised (clean) TS page. Attachment 4 provides the existing QAPD page marked up to show the proposed change.

NPPD requests review and approval of this license amendment request within one year of acceptance. Once approved, the amendment shall be implemented within 60 days.

There are no regulatory commitments made in this submittal.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated State of Nebraska Official.

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. Description and Assessment
2. Proposed Technical Specifications Change (Mark-Up)
3. Revised Technical Specifications Page
4. Quality Assurance Program for Operation – Policy Document Change
(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

Description and Assessment

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

- 1.0 SUMMARY
- 2.0 DETAILED DESCRIPTION
 - 2.1 Proposed Change
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- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements/Criteria
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1.0 SUMMARY

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit" Nebraska Public Power District (NPPD) is requesting that the Technical Specifications (TS) of the Cooper Nuclear Station (CNS) be amended as proposed to permit relocation of the Unit Staff Qualification ANSI N18.1-1971 (Reference 1), including exceptions, to the CNS Quality Assurance Program for Operation – Policy Document (QAPD) (Reference 2).

2.0 DETAILED DESCRIPTION

2.1 Proposed Change

The specific TS change is also shown in Attachment 2. The proposed change is as follows:

The CNS TS 5.3.1 currently states:

"5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of the American National Standards Institute N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," with the following exceptions:

- a. The radiological manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2.
- b. The Shift Manager, Senior Operator, Licensed Operator, and Shift Technical Engineer shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 3.
- c. The operations manager shall meet or exceed the qualifications of ANSI N18.1-1971 except for the requirement to have a current Senior Reactor Operator's (SRO) license, which shall be in accordance with Technical Specification 5.2.2.e. If not currently licensed, the operations manager shall have previously held a SRO license."

The proposed change will revise CNS TS 5.3.1 to read as follows:

"5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions, as specified in the Cooper Nuclear Station Quality Assurance Program for Operation – Policy Document."

2.2 Background

NPPD is requesting approval to move the referenced ANSI standard (Reference 1) in the unit staff qualification requirements of the TS, including exceptions, to the QAPD. The change will provide flexibility in adopting updated Nuclear Regulatory Commission (NRC) endorsed standards for unit staff qualifications without the need to submit license amendment requests. The referenced ANSI standard and Regulatory Guide (RG) 1.8 alternatives in the QAPD currently align with the existing TS requirement. Future changes to the QAPD will be controlled via the 10 CFR 50.54(a) evaluation process.

3.0 TECHNICAL EVALUATION

The proposed change will relocate the TS Unit Staff Qualification ANSI N18.1-1971 (Reference 1) requirements for nuclear plant personnel, including exceptions, from the TS to the CNS QAPD.

This license amendment request does not change any current staff ANSI qualification requirements for CNS and is only an administrative TS change.

10 CFR 50.36(c)(5), requires TS to include items in the administrative controls category. Items include provisions relating to organization and management, procedures, recordkeeping, review and audit and reporting necessary to assure operation of the facility in a safe manner. In 1995, the NRC acknowledged that many license amendments were being processed (e.g., organizational changes, position title changes, organization description changes, procedure review process, etc.) to relocate TS items to the licensee's quality assurance plan. The items being relocated from the TS did not satisfy the criteria of 10 CFR 50.36 for inclusion as a limiting condition for operation and were adequately controlled by other regulations and related licensee programs. The NRC issued Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," to address this issue and to provide additional guidance for relocating TS administrative controls to the licensee's quality assurance plan. The proposed change is consistent with the guidance in AL 95-06 for relocating a licensee's TS requirements to its quality assurance plan.

The unit staff qualifications do not satisfy the criteria of 10 CFR 50.36 for inclusion in TS as a limiting condition for operation and are adequately controlled by other regulations and CNS training programs. CNS meets the training requirements specified in 10 CFR 55, "Operators' Licenses," 10 CFR 50.120, "Training and qualification of nuclear power plant personnel," and NUREG-1021, "Operator Licensing Examination Standards for Power Reactors." In addition, on March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel, which endorsed the training accreditation program developed by the Institute of Nuclear Power Operations (INPO), in association with National Academy for Nuclear Training (NANT). The NRC has documented discussion, approval, and acceptance of NANT guidelines in RIS 01-001, "Eligibility of Operator License Applicants," and NUREG-1021, "Operator Licensing Examinations Standards for Power Reactors." CNS training programs employ the systematic approach to training (SAT) required by 10 CFR 50.120 as embodied in the INPO NANT standards for plant staff personnel and their qualifications.

In summary, the proposed change does not change current staff qualification requirements. The unit staff qualification requirements are the same between the current CNS TS and the current CNS QAPD. Changes to the CNS QAPD are evaluated under the 10 CFR 50.54(a) evaluation process.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The following NRC requirements and guidance documents are applicable to the proposed change.

10 CFR 50.36

10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," Section 36, "Technical specifications," Paragraph (c)(5), "Administrative controls," requires provisions relating to organization and management procedures, recordkeeping, review and audit, and reporting to be included in the technical specification that are necessary to assure operation of the facility in a safe manner. The proposed change conforms to 10 CFR 50.36(c)(5) requirements.

10 CFR 50.120

10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," Section 120, "Training and qualification of nuclear power plant personnel," requires that each nuclear power plant applicant for and holder of an operator license shall establish, implement, and maintain the training and qualification programs that are derived from a systems approach to training as defined in 10 CFR 55.4. The proposed change conforms to 10 CFR 50.120 requirements.

10 CFR 55

10 CFR 55, "Operators' Licenses," Subpart D, "Applications," requires that operator license applications include information concerning an individual's education, experience, and other related matters to provide evidence and certification that the applicant has successfully completed the facility licensee's training program that is based on a systems approach to training. The proposed change conforms to 10 CFR 55 requirements.

NUREG-1021, Revision 12

NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," establishes the policies, procedures, and practices for examining licensees and applicants for reactor operator and senior reactor operator licenses at nuclear power reactor facilities under 10 CFR Part 55, "Operators' Licenses." The NPPD operator training program meets the current requirements of NANT Academy Document, ACAD 10-001. The proposed change conforms to NUREG-1021 requirements.

Regulatory Guide 1.8, Revision 3

RG 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," describes a method that the NRC finds acceptable for complying with the NRC's regulations regarding training and qualification of nuclear power plant personnel. The proposed change conforms to RG 1.8 (Revisions 2-3).

Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance"

Licensees have been requesting amendments to technical specifications that are located in the "administrative controls" section and are related to quality assurance programs. Licensees have frequently requested amendments to these specifications because they contain detailed information that is affected by organizational and process changes. Many licensees have revised their technical specifications to remove excessive detail, thereby gaining flexibility in making organization changes without the need for a license amendment.

In addition, recent amendment requests related to quality assurance have also followed the trend for other technical specifications and have included moving requirements to licensee-controlled documents and programs. The quality assurance program is a logical candidate for such relocation due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of U.S. NRC-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The relocation of technical specification requirements in cases where adequate controls are provided by such other methods can reduce the resources spent by licensees and the U.S. NRC staff in preparing and reviewing license amendment requests.

The proposed change to relocate TS staff ANSI qualification requirements conform to AL 95-06 in that the ANSI standards being relocated are considered quality assurance standards that do not satisfy the criteria of 10 CFR 36 for inclusion as a limiting condition for operation and are adequately controlled by other regulations (e.g., 10 CFR 50.120 and 10 CFR 55) and license programs (CNS Training Programs that comply with INPO NANT standards).

4.2 Precedent

The proposed change is consistent with NRC-approved license amendments issued to Exelon Generation Company, LLC, on August 2, 2018 (NRC ADAMS Accession No. ML18206A282). The amendments revise the technical specifications for each facility to relocate the licensee's staff qualification requirements to the Exelon Quality Assurance Topical Report (References 3 and 4).

The proposed change is also consistent with NRC-approved license amendments issued to Duke Energy Corporation on August 12, 2020 (NRC ADAMS Accession No. ML20083F927). The amendments revise the technical specifications for each facility to relocate the licensee's staff qualification requirements to the Duke Energy Quality Assurance Program Description (References 5 and 6).

4.3 No Significant Hazards Consideration Analysis

Nebraska Public Power District (NPPD) requests approval of a proposed change to the Cooper Nuclear Station (CNS) Technical Specifications (TS) 5.3, "Unit Staff Qualifications." The proposed change will relocate the TS Unit Staff Qualification requirement ANSI N18.1-1971, including exceptions, to the CNS Quality Assurance Program for Operation – Policy Document (QAPD).

NPPD has evaluated if a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The unit staff qualification requirements remain the same and are being relocated from the Technical Specifications to the CNS QAPD. The proposed change is administrative in nature, does not make any physical changes to the plant, and does

not alter accident analysis assumptions, add initiators or affect function of plant systems, or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems and components relied upon to mitigate the consequences of postulated accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change does not involve changes to unit staff selection, qualification and training programs. The proposed change is administrative in nature and does not impact physical plant systems. The qualification standards are being relocated from the TS to the CNS QAPD. As a result, the ability of the plant to respond to and mitigate accidents is unchanged by the proposed change. The proposed change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change is administrative in nature. The proposed change does not affect plant design, hardware, system operation, or procedures for accident mitigation system. The proposed change does not impact any plant safety margins that are established in existing limiting conditions for operation, limiting safety systems settings and specified safety limits. There is no change in the established safety margins of these systems. The proposed change does not impact the performance or proficiency requirements for licensed operators or unit staff, since the qualification standards are not changing and are only being relocated from the TS to the CNS QAPD. As a result, the ability of the plant to respond to and mitigate accidents is unchanged by the proposed change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, NPPD concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined the proposed change qualifies for a categorical exclusion from environmental review in accordance with 10 CFR 51.22. The proposed action is confined to administrative, procedural, or solely financial changes as described in 10 CFR 51.22(a)(1). Therefore, pursuant to 10 CFR 51.22, neither an environmental assessment nor an environmental impact statement is required.

6.0 REFERENCES

1. ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," approved by ANSI dated March 8, 1971.
2. CNS Quality Assurance Program for Operation – Policy Document.
3. Exelon Fleet License Amendment Request to Relocate Technical Specification Unit/Facility/Plant Staff Qualification ANSI N18.1-1971 and ANSI/ANS-3.1-1978 Requirements to the Exelon Quality Assurance Topical Report (QATR), dated March 1, 2018 (ADAMS Accession No. ML18060A266).
4. Exelon Fleet Issuance of Amendments to Relocate the Staff Qualification Requirements (EPID L-2018-LLA-0053), dated August 2, 2018 (ADAMS Accession No. ML18206A282).
5. License Amendment Application to Relocate Technical Specification Unit/Facility Staff Qualification ANSI N18.1-1971, ANSI/ANS-3.1-1978 and ANSI/ANS-3.1-1981 Requirements to the Duke Energy Corporation Quality Assurance Program Description (Duke-QAPD-001-A), dated July 8, 2019 (ADAMS Accession No. ML19189A033).
6. Brunswick Steam Electric Plant, Units 1 and 2; Catawba Nuclear Station, Units 1 and 2; Shearan Harris Nuclear Power Plant, Unit 1; McGuire Nuclear Station, Units 1 and 2; Oconee Nuclear Station, Units 1, 2, and 3; and H.B. Robinson Steam Electric Plant, Unit 2 – Issuance of Amendments to Relocate the Unit/Facility/Plant Staff Qualification Requirements to the Duke Energy Quality Assurance Program Description (EPID L-2019-LLA-0142) dated August 12, 2020 (ADAMS Accession No. ML20083F927).

ATTACHMENT 2

Proposed Technical Specifications Change (Mark-Up)

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

Revised Page

5.0-4

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

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- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions, as specified in the Cooper Nuclear Station Quality Assurance Program for Operations – Policy Document, ~~of the American National Standards Institute N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," with the following exceptions:~~
- a. ~~The radiological manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2.~~
 - b. ~~The Shift Manager, Senior Operator, Licensed Operator, and Shift Technical Engineer shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 3.~~
 - c. ~~The operations manager shall meet or exceed the qualifications of ANSI N18.1-1971 except for the requirement to have a current Senior Reactor Operator's (SRO) license, which shall be in accordance with Technical Specification 5.2.2.e. If not currently licensed, the operations manager shall have previously held a SRO license.~~
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ATTACHMENT 3

Revised Technical Specifications Page

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

Revised Page

5.0-4

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions, as specified in the Cooper Nuclear Station Quality Assurance Program for Operations – Policy Document.
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ATTACHMENT 4

**Quality Assurance Program for Operation – Policy Document Change (Mark-up) –
For Information Only**

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

Revised Page

Table 1
Regulatory Commitments

A. Regulatory Guide 1.8, Personnel Selection and Training, Revision 1, dated September 1975

ANSI N18.1- 1971, Selection and Training of Nuclear Power Plant Personnel

Clarification/Exception

1. General Qualification requirements for personnel will meet ANSI N18.1-1971, with the following exceptions ~~as identified in the Technical Specifications.~~
 - a. The radiological manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 2.
 - b. The Shift Manager, Senior Operator, Licensed Operator, and Shift Technical Engineer shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 3.
 - c. The operations manager shall meet or exceed the qualifications of ANSI N18.1-1971 except for the requirement to have a current Senior Reactor Operator's (SRO) license, which shall be in accordance with Technical Specification 5.2.2.e. If not currently licensed, the operations manager shall have previously held a SRO license.
2. General The following qualifications may be considered equivalent to a bachelor's degree:
 - a. 4 years of post secondary schooling in science or engineering,
 - b. 4 years of applied experience at a nuclear facility in the area for which qualification is sought,
 - c. 4 years of operational or technical experience/training in nuclear power, or
 - d. any combination of the above totaling 4 years.

Years of experience used to meet the education requirements as allowed by this exception shall not be used to also meet the experience requirements.