

Table 5-1 of EPA 400-R-92-001 "Manual of Protective Action Guides and Protective Guides for Nuclear Incidents" (US EPA, May 1992).

Based on the above a calculated dose of $3.23\text{E}-4$ mrem to the maximally exposed individual represents a conservative estimate for an accidental release. For comparison Section 3.1 of the SNEC Facility USAR estimated the dose from an unfiltered release due to a material handling event of 1.5 mrem to the maximally exposed individual.

Thus this proposed change does not involve a significant increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously analyzed in the SNEC Facility USAR.

For the portions of the amendment that would make a change to the organization to add the position of Vice-President GPU Nuclear Oversight to reflect the merger of GPU Inc. and FirstEnergy Corp, these changes are administrative in nature. As such they have no effect on the probability of occurrence or consequences of an accident or malfunction of equipment important to safety.

2. The proposed changes to the SNEC Technical Specifications will not create the possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report.

As described in the response to item 1 above, the limiting accidental release during segmentation of the Containment Vessel dome involves the direct release of radioactive material to the environment. This event is similar to both a material handling event as described in Section 3.1 of the SNEC Facility USAR, and loss of engineering controls during segmentation as described in Section 3.4 of the SNEC Facility USAR. Thus the possibility of a new accident is not created.

For the portions of the amendment that would make a change to the organization to add the position of Vice-President GPU Nuclear Oversight to reflect the merger of GPU Inc. and FirstEnergy Corp, these changes are administrative in nature. As such they have no effect on the possibility of an accident or malfunction of a different type.

3. The changes will not involve a significant reduction in the margin of safety as defined in the basis for any technical specification for SNEC. The SNEC Facility Technical Specifications do not contain a defined margin of safety. However the implied margin of safety is to protect members of the public from exposure to radioactive material.

At the point in time that these Technical Specifications would take affect general radiation levels in the SNEC Facility Containment Vessel would be such that the Containment Vessel could be opened for

unrestricted use as defined in 10 CFR 20.1301. Additionally the dose to a maximally exposed individual from an accidental release during removal of the Containment Vessel dome is several orders of magnitude below that from the limiting accidents defined in the SNEC Facility USAR. Thus the margin of safety is not reduced.

For the portions of the amendment that would make a change to the organization to add the position of Vice-President GPU Nuclear Oversight to reflect the merger of GPU Inc. and FirstEnergy Corp, these changes are administrative in nature. As such they have no effect on the margin of safety as defined in the basis for any technical specification for SNEC.

The NRC staff has reviewed the analysis of the licensees and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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TABLE 1.—MAXIMUM EXPOSED INDIVIDUAL DOSE FROM CUTTING THE CV

Isotope	CV concrete activity (Ci) per table 4.13 SNEC char. report	Fraction remaining as dust (uCi)	CV wall area concentration (uCi/m) ²	CV air concentration (uCi/m) ³	Instantaneous release rate (uCi/sec) ⁴	Concentration (uCi/cm) ³	DCF ⁷	Offsite dose (mrem)
Am-241	8.24e-05	4.68e-03	5.17e-06 ..	9.83e-08 ..	2.93e-04	9.99e-13	1.47e+05 ..	1.47e-04
Co-60	4.60e-02	2.61e+00 ..	2.89e-03 ..	5.49e-05 ..	1.63e-01	5.57e-10	7.50e+01 ..	4.18e-05
Cs-137	2.38e-01	1.35e+01 ..	1.49e-02 ..	2.84e-04 ..	8.46e-01	2.88e-09	1.14e+01 ..	3.28e-05
C-14	5.74e-03	3.26e-01	3.60e-04 ..	6.84e-06 ..	2.04e-02	6.96e-11	6.94e-01	4.83e-08
Eu-152	1.42e-03	8.07e-02	8.91e-05 ..	1.69e-06 ..	5.05e-03	1.72e-11	7.50e+01 ..	1.29e-06
H-3	1.29e-01	7.33e+00 ..	8.10e-03 ..	1.54e-04 ..	4.58e-01	1.56e-09	2.14e-02	3.34e-08
Ni-63	3.93e-02	2.23e+00 ..	2.47e-03 ..	4.69e-05 ..	1.40e-01	4.76e-10	2.11e+00 ..	1.01e-06
Pu-239	5.24e-05	2.98e-03	3.29e-06 ..	6.25e-08 ..	1.86e-04	6.35e-13	1.44e+05 ..	9.17e-05
Pu-241	1.84e-04	1.05e-02	1.15e-05 ..	2.19e-07 ..	6.54e-04	2.23e-12	2.75e+03 ..	6.13e-06
Sr-90	1.59e-04	9.03e-03	9.98e-06 ..	1.90e-07 ..	5.65e-04	1.93e-12	4.44e+02 ..	8.56e-07
Total	4.60e-01	2.61e+01	1.63e+00	2.70e+05

¹ Fraction remaining determined by: (299 lbs dust/5.26E6 lbs total concrete in CV) × 1E6 uCi/Ci × CV concrete activity.

² Area concentration determined by dividing dust fraction remaining by 9.05E2 m² (surface of CV shell being removed).

³ Air concentration determined by multiplying CV wall area activity by 1.9E-2/m (NUREG 0130 resuspension factor for dust sweeping).

⁴ Calculated by multiplying CV air specific activity by CV volume (2.98E3 m³) instantaneously released in one second.

⁵ Maximum atmospheric dispersion factor (X/Q) is 3.41E-3 sec/m³ at the site boundary (200 meters) and in Sector N per SNEC ODCM Revision 5.

⁶ Calculated by multiplying X/Q × activity released in uCi/sec × 1e-6 m³/cm³.

⁷ Per EPA 400-R-92-001, Table 5-1.

Nebraska Public Power District, Docket No. 50-298, Cooper Nuclear Station, Nemaha County, Nebraska

Date of amendment request: July 10, 2002.

Description of amendment request: This proposed amendment would replace the fire protection (FP) requirements contained in Facility

Operating License (FOL) Section 2.C.(4) with the standard fire protection FOL condition recommended by Generic Letter 86-10, Section F, adapted to Cooper Nuclear Station (CNS).

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the

issue of no significant hazards consideration, which is presented below:

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

The proposed change would revise the CNS Operating License condition concerning