



444 South 16th Street Mall  
Omaha NE 68102-2247

June 18, 2001  
LIC-01-0053

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

- References:
1. Docket No. 50-285
  2. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)"

**SUBJECT: Application for Amendment of Operating License**

Pursuant to 10 CFR 50.90, 50.91, and 50.4, Omaha Public Power District (OPPD) is submitting this "Application for Amendment of Operating License" to revise the Fort Calhoun Station Unit No. 1 Technical Specifications.

The proposed amendment deletes items 3 and 4 from Technical Specifications (TS) Section 5.15, "Post-Accident Radiological Sampling and Monitoring," for Fort Calhoun Station (FCS) Unit No. 1 and thereby eliminates the requirements to have and maintain the post-accident sampling system (PASS) at FCS Unit No. 1. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of the TS improvement was announced in the *Federal Register* on October 31, 2000, as part of the consolidated line item improvement process (CLIIP).

Attachment C contains a mark-up reflecting the requested TS changes.

Attachment D provides the revised clean TS page.

Attachment E provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications.

Attachment F provides a summary of the licensing commitments made in this submittal.

OPPD respectfully requests approval of the proposed license amendment by October 31, 2001, with the amendment being implemented within 120 days of issuance.

This letter contains three new commitments and revises (by elimination) all previous commitments regarding the NUREG-0737 requirements for the PASS. The new commitments are detailed in Attachment F.

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If you have additional questions, or require further information, please contact me or members of my staff.

Sincerely,

*W. G. Gates*

W. G. Gates  
Vice President

WGG/JLB/jlb

Attachments

c: E. W. Merschoff, NRC Regional Administrator, Region IV  
A. B. Wang, NRC Project Manager  
W. C. Walker, NRC Senior Resident Inspector  
B. E. Casari, Director - Environmental Health Division, State of Nebraska  
Winston & Strawn

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Attachment A  
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Attachment A  
Application for Amendment of Facility Operating License

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
Omaha Public Power District ) Docket No. 50-285  
(Fort Calhoun Station )  
Unit No. 1) )

APPLICATION FOR AMENDMENT  
OF  
FACILITY OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the U. S. Nuclear Regulatory Commission (“the Commission”), Omaha Public Power District, holder of Facility Operating License No. DPR-40, herewith requests that Technical Specifications set forth in Appendix A of the Facility Operating License be amended to: eliminate the requirements to have and maintain the post-accident sampling system (PASS) at Fort Calhoun Station Unit No. 1.

The proposed changes to the Technical Specifications are provided in Attachment C of this Application. Attachment D provides revised clean Technical Specification changes. A Description and Assessment which demonstrates the proposed changes do not involve significant hazards, is appended in Attachment E. Attachment F provides a summary of the licensing commitments made in this submittal. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-366, “Elimination of Requirements for a Post Accident Sampling System (PASS).” The proposed changes to Appendix A, Technical Specifications of the Facility Operating License, would not authorize any change in the types or any increase in the amounts of effluents or any change in the authorized power level of the facility.

WHEREFORE, Applicant respectfully requests that Appendix A of the Facility Operating License be amended hereto as Attachment D.

A copy of this Application, including its attachments, has been submitted to the Director-Nebraska State Division of Environmental Health, as required by 10 CFR 50.91.

OMAHA PUBLIC POWER DISTRICT

*W. G. Gates*

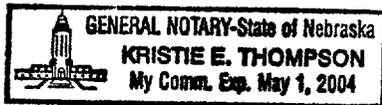
W. G. Gates  
Vice President

STATE OF NEBRASKA    )  
                                  ) ss  
COUNTY OF DOUGLAS    )

Subscribed and sworn to me, a Notary Public in and for the State of Nebraska on this

18<sup>th</sup> day of June 2001.

*Kristie E. Thompson*  
Notary Public



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Attachment B  
AFFIDAVIT

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
Omaha Public Power District ) Docket No. 50-285  
(Fort Calhoun Station )  
Unit No. 1) )

AFFIDAVIT

W. G. Gates, being duly sworn, hereby deposes and says that he is the Vice President in charge of all nuclear activities of the Omaha Public Power District; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached information concerning the Application for Amendment of the Facility Operating License dated June 18, 2001, regarding the elimination of requirements to have and maintain the post-accident sampling system (PASS) at the Fort Calhoun Station Unit No. 1; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information, and belief.

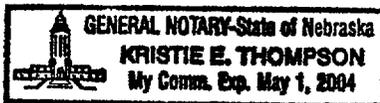
W. G. Gates

W. G. Gates  
Vice President

STATE OF NEBRASKA )  
 ) ss  
COUNTY OF DOUGLAS )

Subscribed and sworn to me, a Notary Public in and for the State of Nebraska on this  
18<sup>th</sup> day of June 2001.

Kristie E. Thompson  
Notary Public



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Attachment C  
Requested Changes to Technical Specifications Set Forth  
in Appendix A of the Facility Operating License  
No. DPR-40

## TECHNICAL SPECIFICATIONS

### 5.0 ADMINISTRATIVE CONTROLS

#### 5.14 Systems Integrity

A program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels shall be implemented. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

#### 5.15 Post-Accident Radiological Sampling and Monitoring

The following programs shall be implemented and maintained to ensure the capability to accurately monitor and/or sample and analyze radiological effluents and concentrations in a post-accident condition:

1. A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. (Any space which will require occupancy to permit an operator to aid in mitigation of, or recovery from, an accident is designated as vital.)
2. A program which will ensure the capability to obtain and analyze radioactive iodines and particulates in plant gaseous effluents.
- ~~3. A program which will ensure the capability to obtain and analyze a reactor coolant liquid sample under accident conditions.~~
- ~~4. A program which will ensure the capability to obtain and analyze a containment atmosphere sample under accident conditions.~~

These programs shall include the following:

1. Training of personnel.
2. Procedures for monitoring and/or sampling and analysis.
3. Provisions for maintenance of sampling and analysis equipment.

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Attachment D  
Revised Changes to Technical Specifications Set Forth  
in Appendix A of the Facility Operating License  
No. DPR-40

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2. A program which will ensure the capability to obtain and analyze radioactive iodines and particulates in plant gaseous effluents.

These programs shall include the following:

1. Training of personnel.
2. Procedures for monitoring and/or sampling and analysis.
3. Provisions for maintenance of sampling and analysis equipment.

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Attachment E  
Description and Assessment

## Description and Assessment

### 1.0 DESCRIPTION

The proposed License Amendment deletes the program requirements described in items 3 and 4 of Technical Specification (TS) 5.15, "Post-Accident Radiological Sampling and Monitoring." Items 3 and 4 of TS 5.15 will be deleted entirely.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. The availability of this TS improvement was announced in the *Federal Register* on October 31, 2000, as part of the consolidated line item improvement process (CLIIP).

### 2.0 ASSESSMENT

#### 2.1 Applicability of Published Safety Evaluation

OPPD has reviewed the safety evaluation published on October 31, 2000, as part of the CLIIP. This verification included a review of the NRC staff's Safety Evaluation, determination of No Significant Hazards Consideration, and determination of categorical exclusion as set forth in 10 CFR 51.22(c)(9), as well as the information provided to support TSTF-366 (i.e., CE NPSD-1157, Revision 1, "Technical Justification for the Elimination of the Post-Accident Sampling System From the Plant Design and Licensing Bases for CEOG Utilities," dated May 5, 1999, as supplemented by letter dated April 14, 2000). In addition, OPPD reviewed the NRC Safety Evaluation for CE NPSD-1157, dated May 16, 2000 (TAC NO. MA5661). OPPD has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Fort Calhoun Station Unit No. 1 and justify this amendment for the incorporation of the changes to the Fort Calhoun Station Unit No. 1 TS.

#### 2.2 Optional Changes and Variations

Requirements for installing and maintaining the PASS were included in a confirmatory order for Fort Calhoun Station Unit No. 1 issued to OPPD on March 14, 1983. This amendment request includes superseding the requirements for the PASS imposed by that confirmatory order.

OPPD is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000. Note 2 of the October 31, 2000 NRC Safety Evaluation (SE) identified three other potential TS changes for which the staff provided discussion. For Fort Calhoun Station Unit No. 1, applicability is as follows:

- (1) Editorial changes - There are no editorial changes required to the Fort Calhoun Station Unit No. 1 TS to account for the change covered in this request.

- (2) Mention of PASS as a potential leakage source outside containment - Fort Calhoun Station Unit No. 1 TS 5.14, "Systems Integrity," provides for a program to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. Upon implementation of this license amendment request, the PASS will not interface with any systems containing highly radioactive fluids and is therefore not included in TS.
- (3) Bases changes for "Post Accident Monitoring Instrumentation" - The current bases for TS 2.21, "Post-Accident Monitoring Instrumentation," do not mention the PASS and therefore, this issue is not applicable to this request.

### 3.0 REGULATORY ANALYSIS

#### 3.1 No Significant Hazards Determination

OPPD has reviewed the proposed no significant hazards consideration determination published on October 31, 2000, as part of the CLIIP. OPPD has concluded that the proposed determination presented in the notice is applicable to Fort Calhoun Station Unit No. 1 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.92(a).

#### 3.2 Verification and Commitments

As discussed in the notice of availability published in the *Federal Register* on October 31, 2000, for this TS improvement, plant-specific verifications were performed as follows:

1. OPPD will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in plant procedures and implemented with the implementation of the license amendment. Establishment of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold has been evaluated for Fort Calhoun Station Unit No. 1 at radioactivity levels of 300  $\mu\text{Ci}/\text{cc}$  dose equivalent iodine.<sup>1</sup> This capability was evaluated through use of the normal sampling system and correlating normal sample system dose rates to coolant radioisotope concentrations. This capability will be described in plant procedures and implemented with the implementation of the license amendment. The capability for classifying fuel damage events is considered a regulatory commitment.

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<sup>1</sup> In CE NPSD-1157, Revision 1, Page C2 of C3, "Role of PASS in Emergency Planning" Table, for FCS it is indicated that PASS related Emergency Action Level (EAL) Declarations are "Used for ALERT @ 180  $\mu\text{Ci}/\text{cc}$  I<sup>131</sup> Eq", Page C3 of C3 Note 5: "Normal Sampling System capable of monitoring > 7% fuel failures ("gap releases")." It has been verified in a recent calculation that FCS has the capability of classifying fuel damage at a higher threshold (i.e., 300  $\mu\text{Ci}/\text{cc}$  I<sup>131</sup> Equivalent (Eq)). FCS has evaluated the more conservative and higher threshold (300  $\mu\text{Ci}/\text{cc}$  I<sup>131</sup> Eq) for classifying fuel damage and has demonstrated via calculations and correlations the ability to obtain and analyze samples from the reactor coolant system (RCS), the containment sump, and the containment atmosphere in accident conditions.

3. OPPD has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability will be described in plant procedures. The capability to monitor radioactive iodines released to the environment is considered a regulatory commitment.

#### 4.0 ENVIRONMENTAL EVALUATION

OPPD has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIP. OPPD has concluded that the staff's findings presented in that evaluation are applicable to Fort Calhoun Station Unit No. 1, and the evaluation is hereby incorporated by reference for this application.

#### 5.0 CONCLUSION

The Fort Calhoun Station Unit No. 1 Plant Review Committee has reviewed this TS Amendment Request and has determined that proposing these changes does not involve a significant hazards consideration. The Safety Audit & Review Committee has also reviewed this amendment request.

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Attachment F  
Summary of Licensing Commitments

## List of Commitments

The following table identifies those actions committed to by OPPD in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Mark Frans, Manager-Nuclear Licensing, Fort Calhoun Station, at (402) 533-6537.

COMMITMENT	Due Date/Event
<p>OPPD will develop contingency plans for obtaining and analyzing highly radioactive samples of the reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in plant procedures and will be implemented within the implementation period of the license amendment. Establishment of these contingency plans is considered a regulatory commitment.</p>	<p>120 days from date of issuance of amendment to Facility Operating License</p>
<p>The capability for classifying fuel damage events at the Alert level threshold has been evaluated for FCS Unit No. 1 at radioactivity levels of 300 <math>\mu\text{Ci/cc}</math> dose equivalent iodine. This capability will be described in plant procedures and implemented within the implementation period of the license amendment. The capability for classifying fuel damage events at the Alert level threshold is considered a regulatory commitment.</p>	<p>120 days from date of issuance of amendment to Facility Operating License</p>
<p>OPPD has the capability to monitor radioactive iodines that have been released offsite to the environment. This capability will be described in plant procedures and will be implemented within the implementation period of the license amendment. The capability to monitor radioactive iodines released to the environment is considered a regulatory commitment.</p>	<p>120 days from date of issuance of amendment of Facility Operating License</p>