

January 11, 2002

Mr. S. K. Gambhir  
Division Manager - Nuclear Operations  
Omaha Public Power District  
Fort Calhoun Station FC-2-4 Adm.  
Post Office Box 399  
Hwy. 75 - North of Fort Calhoun  
Fort Calhoun, NE 68023-0399

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 - ISSUANCE OF AMENDMENT (TAC  
NO. MB2063)

Dear Mr. Gambhir:

The Commission has issued the enclosed Amendment No. 202 to Facility Operating License No. DPR-40 for the Fort Calhoun Station, Unit No. 1. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated May 15, 2001, as supplemented by letters dated June 14 and November 21, 2001.

The amendment (1) replaces the titles of Manager – Fort Calhoun Station and Vice President with generic titles, (2) relocates the requirements for the Plant Review Committee (PRC) and the Safety Audit and Review Committee (SARC) to the Fort Calhoun Station Quality Assurance Program, (3) relocates the requirements for procedure controls and records retention to the Fort Calhoun Station Quality Assurance Program, (4) enhances and clarifies the qualification and training requirements for individuals who perform licensed operator functions, (5) incorporates the Westinghouse/CENP definition of azimuthal power tilt, and (6) eliminates specific mailing address and reporting requirements that are redundant to Title 10 of the Code of Federal Regulations.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

**/RA/**

Alan B. Wang, Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosures: 1. Amendment No. 202 to DPR-40  
2. Safety Evaluation

cc w/encls: See next page

January 11, 2002

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Sincerely,  
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 Alan B. Wang, Project Manager, Section 2  
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Docket No. 50-285

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cc w/encls: See next page  
 \*For previous concurrences  
 see attached ORC

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Ft. Calhoun Station, Unit 1

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OMAHA PUBLIC POWER DISTRICT

DOCKET NO. 50-285

FORT CALHOUN STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 202  
License No. DPR-40

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Omaha Public Power District (the licensee) dated May 15, 2001, as supplemented by letters dated June 14 and November 21, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, Facility Operating License No. DPR-40 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B. of Facility Operating License No. DPR-40 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 202, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance and shall be implemented within 30 days from the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

***/RA/***

Stephen Dembek, Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: January 11, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 202

FACILITY OPERATING LICENSE NO. DPR-40

DOCKET NO. 50-285

Replace the following pages of Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

REMOVE

INSERT

7	7
2-57e	2-57e
5-1	5-1
5-1a	5-2
5-1b	----
5-2	5-3
5-3	----
5-4	----
5-5	----
5-6	----
5-7	----
5-8	----
5-9	5-4
5-9a	5-5
5-10	5-6
5-11	5-7
5-12	----
5-15	5-7
5-17a	5-8
5-17b	5-9
5-18	5-10
5-19a	----
5-20	5-11
5-21	5-12
5-22	5-13
5-23	5-14
5-24	5-15
5-25	5-16
5-26	5-17

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 202 TO FACILITY OPERATING LICENSE NO. DPR-40

OMAHA PUBLIC POWER DISTRICT  
FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

1.0 INTRODUCTION

By application dated May 15, 2001, as supplemented by letters dated June 14 and November 21, 2001, Omaha Public Power District (OPPD) requested changes to the Technical Specifications (TS) (Appendix A to Facility Operating License No. DPR-40) for the Fort Calhoun Station (FCS), Unit No. 1. The requested changes would: (1) replace the titles of Manager – Fort Calhoun Station and Vice President with generic titles, (2) relocate the requirements for the Plant Review Committee (PRC) and the Safety Audit and Review Committee (SARC) to the FCS Quality Assurance Program (QAP), (3) relocate the requirements for procedure controls and records retention to the FCS QAP, (4) enhance and clarify the qualification and training requirements for individuals who perform licensed operator functions, (5) incorporate the Westinghouse/CENP definition of azimuthal power tilt, and (6) eliminate specific mailing address and reporting requirements that are redundant to Title 10 of the Code of Federal Regulations (10 CFR).

The supplemental letters dated June 14, 2001 and November 21, 2001, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on June 27, 2001 (66 FR 34287).

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TS are to be included as part of the license. The Commission's regulatory requirements related to the content of the TSs are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

Section 50.36 provides, that with respect to LCOs, four criteria to be used in determining whether particular safety functions are required to be included in the TS. While the four criteria

specifically apply to LCOs, in adopting the revision to the rule the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TS (60 FR 36957). Addressing administrative controls, 10 CFR 50.36 states that they "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure safe operation of the facility in a safe manner." The specific content of the administrative controls section of the TS is therefore that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff has determined that requirements that are not specifically required under 10 CFR 50.36(c)(5) and which are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, can be removed from administrative controls. Existing TS requirements, therefore, may be relocated to more appropriate documents (e.g. Security Plan, QAP, and Emergency Plan) and controlled by the applicable regulatory requirement. Similarly, while the required content of the TS administrative controls is specified in 10 CFR 50.36(c)(5), particular details of administrative controls may be relocated to licensee-controlled documents where 10 CFR 50.54, 10 CFR 50.59, or other regulations provide adequate regulatory control.

### 3.0 EVALUATION

By letter dated December 12, 1995, the staff issued NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." AL 95-06 provided information regarding experiences involving the relocation of TS administrative controls related to quality assurance. In AL 95-06, the staff compared the content of typical TS administrative controls related to quality assurance requirements for those plants that have not converted to the Improved Standard Technical Specifications (ISTS), with established staff positions and various amendment requests. On the basis of this review, the staff provided several observations in order to assist those licensees considering amendment requests related to quality assurance requirements.

OPPD in its May 15, 2001, letter proposed to relocate the requirements for the PRC, the SARC, the procedure controls, and the records retention from the TSs to the FCS QAP. In addition, OPPD proposed to replace the titles of Manager – Fort Calhoun Station and Vice President with generic titles, enhance and clarify the qualification and training requirements for individuals who perform licensed operator functions, incorporate the Westinghouse/CENP definition of azimuthal power tilt, and eliminate specific mailing address and reporting requirements that are redundant to 10 CFR. OPPD has stated that the relocations are in accordance with the guidance contained AL 95-06. In addition, by letter dated June 14, 2001, the licensee stated, as recommended by AL 95-06, that all sections of the TSs to be relocated have been added intact to the FCS QAP. Currently, the proposed relocated TSs reside in both the TSs and the FCS QAP. The staff has reviewed the proposed TS changes and our evaluation for these changes is provided below.

#### 3.1 PRC and SARC

OPPD has proposed to relocate the PRC and SARC TS requirements to the FCS QAP. The PRC and SARC requirements include various review and audit requirements. The staff in AL 95-06 has stated that TS requirements related to independent safety group function and reviews and audits may be relocated to the QAP. The QAP is a logical candidate for such locations due to the controls imposed by such regulations such as Appendix B to 10 CFR

Part 50, the existence of NRC-approved QAPs and commitments to industry quality assurance standards, and the established QAP change process in 10 CFR 50.54(a).

As recommended by AL 95-06, OPPD has stated that it has added the PRC and SARC requirements from the TSs to the FCS QAP intact. The staff has reviewed the proposed changes and verified in Table 1 that all sections of the PRC and SARC TSs have been copied intact to the FCS QAP. Given that the requirements for the PRC and SARC have been copied to the FCS QAP, maintenance of these requirements in the TSs are not necessary as they are now redundant. The PRC and SARC functions, previously controlled by TS, will be controlled to an equivalent level through the FCS QAP which provides for a more appropriate change control process. Change control for the relocated PRC and SARC functions will be provided by 10 CFR 50.54(a) and include requirements for prior NRC review and approval if a change constitutes a reduction in commitment. In addition, the staff concludes that the current TSs described above are not required by 10 CFR 50.36, as they are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. The staff concludes that 10 CFR 50.54(a) provides sufficient control for the PRC and SARC functions, as such the level of safety of plant operation is unaffected by this relocation and the proposed changes are therefore, acceptable.

### 3.2 Procedure Controls

OPPD has proposed to relocate the procedure control TS requirements to the FCS QAP. The procedure control requirements contain requirements for the processes related to the review and approval of procedures and changes to procedures. The staff in AL 95-06 has stated that TS requirements related to the procedure review process may be relocated to the QAP. The QAP is a logical candidate for such locations due to the controls imposed by such regulations such as Appendix B to 10 CFR Part 50, the existence of NRC-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change process in 10 CFR 50.54(a).

As recommended by AL 95-06, OPPD has stated that it has copied the procedure control requirements from the TSs to the FCS QAP intact. The FCS QAP is controlled by several documents including ANSI N18.7-1976. The FCS QAP states that FCS complies with the requirements in ANSI N18.7 with the noted alternatives or exceptions. In particular, FCS uses a dynamic procedure review process instead of a static two year review cycle. This change was approved by the NRC by letter dated April 2, 1994. The staff has reviewed the proposed changes and verified in Table 1 that all sections of the procedure controls TSs have been copied intact to the FCS QAP. However, as a result of our review the staff requested OPPD to review the procedural control requirements against the ISTS. By letter dated November 21, 2001, the licensee proposed the following revisions to the original request:

1. Section 5.2.d will maintain the reference to Section 5.8 of the TS.
2. Section 5.8.1 will be revised to reference the applicable Regulatory Guides and controlling documents (Sections 5.8.1.a and b).
3. Sections 5.8.3, 5.8.4 and 5.8.5 will be renumbered as Sections 5.8.2, 5.8.3 and 5.8.1.c, respectively.
4. Section 5.8.1.d will be added to ensure that all TS required procedures will be

established and maintained as specified in Section 5.8.

5. Sections 5.17 and 5.18 will be modified to reflect the renumbering of Section 5.8.3 in the TS.

These changes make the proposed changes more consistent with the wording in the ISTS and do not change the original intent of relocating the procedural requirements of TS Section 5.8 to the FCS QAP.

Given that the requirements for procedure control have been copied to the FCS QAP, maintenance of these requirements in the TSs are not necessary as they are now redundant. The procedure control functions, previously controlled by TS, will be controlled to an equivalent level through the FCS QAP which provides for a more appropriate change control process. Change control for the relocated procedure control functions will be provided by 10 CFR 50.54(a) and include requirements for prior NRC review and approval if a change constitutes a reduction in commitment. In addition, the staff concludes that the current TSs described above are not required by 10 CFR 50.36, as they are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. The staff concludes that 10 CFR 50.54(a) provides sufficient control for the procedure control functions, as such the level of safety of plant operation is unaffected by this relocation and the proposed changes are therefore, acceptable.

### 3.3 Records Retention

OPPD has proposed to relocate the records retention TS requirements to the FCS QAP. The records retention requirements contain requirements for particular specifications (such as the PRC and SARC and review and audit functions), as well as a section on general requirements for record retention. The staff in AL 95-06 has stated that TS requirements related to records retention may be relocated to the QAP. The QAP is a logical candidate for such locations due to the controls imposed by such regulations such as Appendix B to 10 CFR Part 50, the existence of NRC-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change process in 10 CFR 50.54(a).

As recommended by AL 95-06, OPPD has stated that it has copied the records retention requirements from the TSs to the FCS QAP intact. The staff has reviewed the proposed changes and verified in Table 1 that all sections of the records retention TSs have been copied intact to the FCS QAP. Given that the requirements for records retention have been copied to the FCS QAP, maintenance of these requirements in the TSs are not necessary as they are now redundant. The records retention functions, previously controlled by TS, will be controlled to an equivalent level through the FCS QAP which provides for a more appropriate change control process. Change control for the relocated records retention functions will be provided by 10 CFR 50.54(a) and include requirements for prior NRC review and approval if a change constitutes a reduction in commitment. In addition, the staff concludes that the current TSs

described above are not required by 10 CFR 50.36, as they are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. The staff concludes that 10 CFR 50.54(a) provides sufficient control for the records retention functions, as such the level of safety of plant operation is unaffected by this relocation and the proposed changes are therefore, acceptable.

### 3.4 Definition of Azimuthal Power Tilt and Associated Bases

The proposed change would replace the definition of azimuthal power tilt and add the bases for the definition of azimuthal power tilt to the Bases of Section 2.10.4. In Asea Brown Boveri (ABB) Combustion Engineering (CE) Infobulletin Number 97-07, dated December 31, 1997, CE stated it discovered a discrepancy in the definition for CE analog plants that use Combustion Engineering Core Operating Report (CECOR) for monitoring and surveillance purposes. CE informed FCS that since they use CECOR that they should use the same definition as the CE digital plants. Since this corrects a definition as recommended by the vendor and is consistent with the ISTS, the staff concludes that this proposed change is acceptable.

### 3.5 Specifications 5.2.1, 5.5.1, 5.5.2, 5.6.1, and 5.7.1

The proposed change would replace the specific title, Vice President, with the generic personnel title (corporate officer). This change does not eliminate any of the qualifications, responsibilities or requirements for this position, since the plant-specific personnel title is currently identified in licensee controlled documents such as the Updated Safety Analysis Report (USAR) or the QAP. For example, Section 12 of the USAR describes the management structure and reporting responsibilities of OPPD and provides an organizational chart to determine the corporate officer with responsibility for overall plant nuclear safety from other corporate officers within OPPD. This change is consistent with the ISTS. Based on the above, the staff concludes that this proposed change is editorial in nature and therefore, is acceptable.

### 3.6 Specifications 5.1.1, 5.2.1, 5.2.2, 5.5.1, 5.5.2, 5.8, 5.17, and 5.18

The proposed change would replace the specific title, Manager – Fort Calhoun Station, with the generic personnel title (plant manager). This change does not eliminate any of the qualifications, responsibilities or requirements for this position, since the plant-specific personnel title is currently identified in licensee controlled documents such as the USAR or the QAP. This change is consistent with the ISTS. Based on the above, the staff concludes that this proposed change is editorial in nature and therefore, is acceptable.

### 3.7 Specification 5.2.e

The proposed change revises the requirement to review overtime from monthly to periodically. Normally, overtime is only permitted during planned or forced outages. Thus, it may not be necessary to review overtime monthly when the plant is not in an outage. This allows OPPD more effective use of management oversight. In a letter dated November 21, 2001, OPPD has stated that the overtime review will be performed at least quarterly. The staff concludes that changing the periodicity of review for staff overtime is administrative in nature and therefore, the proposed change is acceptable.

### 3.8 Specification 5.2.f

The proposed change changes the title for the Supervisor - Operations to Manager - Shift Operations and the title for the Licensed Senior Operators to Control Room Supervisors. The Manager - Shift Operations now has the responsibility, authority, and qualification requirements previously conferred upon the Supervisor - Operations. The Control Room Supervisor now has

the responsibility, authority, and qualification requirements previously conferred upon the Licensed Senior Operator. Based on the above, the staff concludes that this an editorial change and therefore, the proposed TS change is acceptable.

### 3.9 Table 5.2-1

The proposed change reflects a clarification for the minimum shift crew composition during core alterations. The current TS requires that 1 individual with a Senior Operator License be present during "Core Alterations" noting that another individual with a Senior Operator License for supervising the core alterations is required. The proposed TS requires 2 individuals with Senior Operator Licenses noting that one individual with a Senior Operator License is required for supervising the core alterations. This did not change the intent of the requirement and is a clarification of the requirements to assure compliance with 10 CFR 50.54. The term "crewman" is being changed to "crewmember" in note (ii), which is gender neutral and clarifying punctuation is added to note (iv), which has no affect on interpretation or implementation. Based on the above, the staff has concluded that these changes are editorial in nature and therefore, are acceptable.

### 3.10 Specifications 5.3.1 and 5.4.1

The proposed change would replace the reference to ANSI N18.1-1971 and Regulatory Guide (RG) 1.8 dated September 1975, with ANSI/ANS 3.1-1993 and RG 1.8, Revision 3, for the Manager - Radiation Protection, the Shift Technical Advisors, and those individuals subject to 10 CFR Part 55 who perform the functions described in 10 CFR 50.54(m). OPPD has complied with the intent of these newer requirements through commitments made in the implementation of NUREG-0737. As the recommendations of this later standard are clearer and adopting them does not change any existing commitments, the staff concludes that the proposed changes are acceptable. In addition, this change is in conformance with NRC Regulatory Issues Summary 2001-01.

### 3.11 Specification 5.5.1

A brief description of the PRC with a reference to the FCS QAP and USAR requirements is being added. As a result of this proposed TS change the requirements for the PRC have been deleted from the TS and relocated to the FCS QAP (see Section 3.1). The staff concludes that this change is editorial in nature as it adds a description of the PRC TS requirements being relocated to the FCS QAP and therefore, is acceptable.

### 3.12 Specification 5.5.2

A brief description of the SARC with a reference to the FCS QAP and USAR requirements is being added. As a result of this proposed TS change, the requirements for the SARC have been deleted from the TS and relocated to the FCS QAP (see Section 3.1). The staff concludes that this change is editorial in nature as it adds a description of the SARC TS requirements being relocated to the FCS QAP and therefore, is acceptable.

### 3.13 Specifications 5.8 and 5.2.d

A brief statement that procedures and administrative policies will be controlled as described in the FCS QAP is being added. As a result of this proposed TS change the requirements for the

procedures control will be deleted from the TS and relocated to the FCS QAP (see Section 3.2). Any changes that could reduce the effectiveness of the FCS QAP must be approved by the NRC in accordance with 10 CFR 50.54(a)(4). The staff concludes that this change is editorial in nature as it adds a description of the procedures control TS requirements being relocated to the FCS QAP and therefore, is acceptable.

#### 3.14 Specifications 5.9, 5.9.1.c, 5.9.2, 5.9.3, and 5.9.5.c

The specific TSs requirements prescribing the submittal address, mail station, titles, and reporting periods are being removed as they are redundant to the requirements contained in 10 CFR. In addition, the proposed change will minimize the need for future changes to this TS resulting from changes to 10 CFR. The staff concludes that these changes are administrative in nature and therefore, are acceptable.

#### 3.15 Specification 5.9.3.d

The specific TSs requirement prescribing the submittal of a Special Maintenance Report is being removed, as this is redundant to requirements contained in 10 CFR 50.73. The initial TSs required the submittal of this "special maintenance report" in the event a redundant component (or system) covered by the TSs was determined to be out of service for a period longer than those specified in other sections of the TSs. The section detailing the specific requirements for this report were removed in 1975 with the implementation of RG 1.16, Revision 4, "Reporting of Operating Information – Appendix A Technical Specifications." Section 2.a of RG 1.16, "Prompt Notification With Written Followup," later to be known as the Licensee Event Report (LER), duplicated or paraphrased these requirements. The staff agrees that this proposed change is administrative in nature as the specific requirements for this report were previously removed and its reporting requirements are redundant to current regulations. Based on the above, the staff concludes that the proposed TS change is acceptable.

#### 3.16 Specifications 5.10, 5.17, and 5.18

A brief statement that records shall be retained as described in the FCS QAP is being added. As a result of this proposed TS change the requirements for the records retention will be deleted from the TS and relocated to the FCS QAP (see Section 3.3). References for relocated requirements will now reference the FCS QAP. Any changes that could reduce the effectiveness of the FCS QAP must be approved by the NRC in accordance with 10 CFR 50.54(a)(4). This change is editorial in nature as it adds a description of the records retention TS requirements being relocated to the FCS QAP and therefore, is acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Nebraska State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

This amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact

statement or environmental assessment need be prepared in connection with the issuance of this amendment.

## 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (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.

Attachment: Table 1

Principal Contributor: A. Wang

Date: January 11, 2002.

Table 1

## RELOCATION OF TECHNICAL SPECIFICATIONS

TS Sections to be Relocated		Section of QA Program Where TS Relocated To		
TS Section	Subject	QA Program Section	Subject	Changes
5.5.1	Plant Review Committee	19	Plant Review Committee	None
5.5.1.1	Function	19 (1)	Function	None
5.5.1.2	Composition	19 (2)	Composition	None
5.5.1.3	Alternates	19 (3)	Alternates	None
5.5.1.4	Meeting Frequency	19 (4)	Meeting Frequency	None
5.5.1.5	Quorum	19 (5)	Quorum	None
5.5.1.6	Responsibilities (a-l)	19 (6)	Responsibilities (a-j)	Removed 2 previous deletions
5.5.1.7	Authority	19 (7)	Authority	None
5.5.1.8	Records	19 (8)	Records	None
5.5.2	Safety Audit and Review Committee	19	Safety Audit and Review Committee	None
5.5.2.1	Function	19 (1)	Function	None
5.5.2.2	Composition	19 (2)	Composition	None
5.5.2.3	Alternates	19 (3)	Alternates	None
5.5.2.4	Consultants	19 (4)	Consultants	None
5.5.2.5	Meeting Frequency	19 (5)	Meeting Frequency	None
5.5.2.6	Quorum	19 (6)	Quorum	None
5.5.2.7	Review (a-i)	19 (7)	Review (a-i)	None
5.5.2.8	Audit (a-j)	19 (8)	Audit (a-g)	Removed 3 previous deletions
5.5.2.9	Authority	19 (9)	Authority	None
5.5.2.10	Records (a-c)	19 (10)	Records (a-c)	None

Table 1

TS Sections to be Relocated		Section of QA Program Where TS Relocated To		
TS Section	Subject	QA Program Section	Subject	Changes
5.8	Procedures	6	Instructions, Procedures and Drawings	Title change
5.8.1	Maintained in TS	6.1	Added to QAP even though maintained in TS	Numbering references
5.8.2		6.2		Numbering references
5.8.2.1		6.2.1		None
5.8.2.2		6.2.2		Numbering references
5.8.2.3		6.2.3		Numbering references
5.8.2.4		6.2.4		None
5.8.2.5		6.2.5		Numbering references
5.8.2.6		6.2.6		Numbering references
5.8.3	Temporary Changes - maintained in TS	6.3	Temporary Changes - Added to QAP even though maintained in TS	Numbering references
5.8.3.a	Maintained in TS	6.3.1	Added to QAP even though maintained in TS	None
5.8.3.b	Maintained in TS	6.3.2	Added to QAP even though maintained in TS	None
5.8.3.c	Maintained in TS	6.3.3	Added to QAP even though maintained in TS	None
5.8.4	Maintained in TS	6.4	Added to QAP even though maintained in TS	Numbering references
5.8.5	Maintained in TS	6.5	Added to QAP even though maintained in TS	None
5.10	Record Retention	18	Quality Assurance Records	Title change
5.10.1	Subsections (a-h)	18.1	Subsections (18.1.1-18.1.7)	Removed 1 previous deletion
5.10.2	Subsection (a-p)	18.2	Subsections (18.2.1-18.2.16)	None
5.10.3		18.3		Numbering references