

March 26, 2002

Mr. R. T. Ridenoure  
Division Manager - Nuclear Operations  
Omaha Public Power District  
Fort Calhoun Station FC-2-4 Adm.  
Post Office Box 550  
Fort Calhoun, NE 68023-0399

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 - ISSUANCE OF AMENDMENT  
(TAC NO. MB3651)

Dear Mr. Ridenoure:

The Commission has issued the enclosed Amendment No. 204 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 December 14, 2001.

The amendment modifies the requirements in TS Section 2.8.2(1), "Containment Penetrations," by removing the requirements for having the equipment hatch closed with four bolts, one door of the personnel access lock closed, and for other containment penetrations to be closed by an operable ventilation isolation actuation signal during core alterations and refueling operations. The amendment also modified the requirements for TS 2.8.2(3), "Ventilation Isolation Actuation Signal (VIAS)" by requiring only one gaseous radiation monitor be operable during core alterations and refueling operations. The TS Bases that were affected by the changes described above were modified. This amendment is based upon the alternate source term design basis site boundary and control room dose analyses previously reviewed and approved by the staff by Amendment No. 201 on December 15, 2001.

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. 204 to DPR-40  
2. Safety Evaluation

cc w/encls: See next page

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**TS Page: ML020870196**

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Ft. Calhoun Station, Unit 1

cc:

Winston & Strawn  
ATTN: James R. Curtiss, Esq.  
1400 L Street, N.W.  
Washington, DC 20005-3502

Mr. Jack Jensen, Chairman  
Washington County Board  
of Supervisors  
Blair, NE 68008

Mr. Wayne Walker, Resident Inspector  
U.S. Nuclear Regulatory Commission  
Post Office Box 309  
Fort Calhoun, NE 68023

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Ms. Julia Schmitt, Section Administrator  
Nebraska Health and Human Services  
Systems  
Division of Public Health Assurance  
Consumer Services Section  
301 Centennial Mall, South  
P. O. Box 95007  
Lincoln, Nebraska 68509-5007

Mr. Richard P. Clemens  
Manager - Fort Calhoun Station  
Omaha Public Power District  
Fort Calhoun Station FC-1-1 Plant  
Post Office Box 550  
Fort Calhoun, NE 68023-0550

Mr. Mark T. Frans  
Manager - Nuclear Licensing  
Omaha Public Power District  
Fort Calhoun Station FC-2-4 Adm.  
Post Office Box 550  
Fort Calhoun, NE 68023-0550

OMAHA PUBLIC POWER DISTRICT

DOCKET NO. 50-285

FORT CALHOUN STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 204  
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 December 14, 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. 204, 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 60 days from the date of its issuance. The implementation of the amendment requires the commitments made by the licensee in Attachment 4 of its December 14, 2001, letter and as discussed in the staff's safety evaluation attached to this amendment. These commitments are to be in place prior to any core alterations or refueling operations.

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: March 26, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 204

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

2-39b  
2.39d  
2.39n  
2-39o  
2-39p  
2-39q  
2-39r  
2-39s

INSERT

2-39b  
2-39d  
2-39n  
2-39o  
2-39p  
2-39q  
2-39r  
2-39s

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 204 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 December 14, 2001, Omaha Public Power District (OPPD) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. DPR-40) for the Fort Calhoun Station, Unit No. 1 (FCS). The amendment proposes to modify the requirements in TS Section 2.8.2(1), "Containment Penetrations," by removing the requirements for having the equipment hatch closed with four bolts, one door of the personnel access lock closed, and for other containment penetrations to be closed by an operable ventilation isolation actuation signal during core alterations and refueling operations. The proposed TS only requires that these penetrations or the equipment hatch enclosure room be capable of being closed. The amendment also proposes to modify the requirements for TS 2.8.2(3), "Ventilation Isolation Actuation Signal (VIAS)" by requiring only one gaseous radiation monitor be operable during core alterations and refueling operations. The TS Bases that were affected by the changes described above were modified. This amendment is based upon the alternate source term design basis site boundary and control room dose analyses previously reviewed and approved by the staff by Amendment No. 201 on December 15, 2001.

2.0 BACKGROUND

2.1 Regulatory Background

Historic development of regulatory requirements for nuclear power plant operation was based on the premise that most potential risk was due to operation at power and, consequently, protection of the public could be ensured by designs and operations that conservatively bounded all conditions by achieving defense-in-depth for power operation. Fuel movement was recognized as a situation for which there was no corresponding power operation scenario, and was judged as an area where additional regulatory protection was necessary. This is reflected in the TS in that there are many containment requirements during power operation, but few requirements apply during the cold shutdown and refueling modes outside of fuel handling and core alterations.

During the late 1980s and early 1990s, the staff and industry realized that significant risk reductions could be achieved during shutdown operation. The staff responded with a rulemaking effort, and industry implemented voluntary initiatives to realize risk improvements.

In recognition of these efforts, work to improve TSs was concentrated on power operation specifications, with the intention to address shutdown once a rule was in place. The Commission, however, subsequently declined to issue a shutdown rule for comment. In SECY-97-168, dated July 30, 1997, the industry's voluntary actions were credited with helping achieve the acceptable level of risk from shutdown operations that now exists at U.S. nuclear power plants. Rather than implementing a new rule only to maintain this acceptable level of risk, in a staff requirements memorandum regarding SECY-97-168 dated December 11, 1997, the Commission instructed the staff to monitor licensee performance during shutdown operations through inspections and other means.

In summary, for the above reasons, TSs for shutdown operations are not always consistent with the amount of risk involved with certain plant configurations.

## 2.2 Relevant Precedents

In response to industry proposals, the staff has had the opportunity to reexamine its policy on the need for containment closure during shutdown operations such as fuel handling. During a public meeting on September 8, 1998, it was agreed that the Perry Nuclear Power Plant (Perry) would be the lead plant for this generic issue. In the NRC's letter dated March 11, 1999, FirstEnergy Nuclear Operating Company's (the licensee for Perry) request was approved, and subsequently, similar license amendments have been approved for nuclear facilities of various designs. The licensee has noted these recent regulatory developments concerning containment closure during shutdown operations, and, while accounting for design differences, has supported its proposed TS change with logic similar to that used by the staff in its approval of the amendment requested by FirstEnergy Nuclear Operating Company.

## 2.3 Licensee Rationale for TS Change

The licensee states that this proposed change would be beneficial from a cost savings point-of-view. Outages would proceed more efficiently because load-in/load-out activities could be performed as necessary, and the containment equipment hatch would only need to be opened and closed once. This savings in time would result in a cost savings.

The licensee further states that based on a conservative dose calculation, the risk to the health and safety of the public as a result of a fuel handling accident (FHA) is minimal. FCS procedures require that fuel cannot be moved until 72 hours after shutdown (72 hours of decay). Radioactive decay is a natural phenomenon that is modeled in the deterministic analysis. It has a reliability of 100 percent in reducing the radiological release from damaged fuel rods. In addition, TS requirements are in place that require more than 23 feet of water above the top of the reactor vessel flange. This requirement applies to core alterations and refueling operations in containment. Requiring at least 23 feet of water above the flange provides a barrier for significant radiological release. Administrative controls will be in place such that the equipment hatch enclosure doors or the equipment hatch, one PAL door, and other containment penetrations shall be closed in the unlikely event of an FHA. The TS requirement to maintain ventilation isolation actuation signal (VIAS) with one gaseous radiation monitor operable will be in place to ensure that if an FHA results in a release of radiation, that it can be identified for the safety of plant workers and to allow mitigating actions. Therefore, the risk to the health and safety of the public as a result of allowing the equipment hatch, PAL

doors, and other containment penetrations to be open during core alterations and refueling operations is minimal.

### 3.0 EVALUATION

The amendment proposes to modify the requirements in TS Section 2.8.2(1), "Containment Penetrations," by removing the requirements for having the equipment hatch closed with four bolts, one door of the personnel access lock closed, and for other containment penetrations to be closed by an operable ventilation isolation actuation signal during core alterations and refueling operations. The proposed TS only requires that these penetrations or the equipment hatch enclosure room be capable of being closed. The amendment also proposes to modify the requirements for TS 2.8.2(3), "Ventilation Isolation Actuation Signal (VIAS)" by requiring only one gaseous radiation monitor be operable during core alterations and refueling operations. To ensure that the current acceptable level of safety is maintained, the evaluation of OPPD's proposed TS change focused on two main issues: (1) dose calculations, and (2) administrative controls.

#### 3.1 Dose Calculations

The dose calculations supporting this proposed TS change were originally performed to justify a license amendment request dated February 7, 2001, that proposed to replace the current source term used in design radiological analyses for control room habitability with an alternative source term (AST) pursuant to 10 CFR 50.67, "Accident Source Term." By letter dated December 5, 2001, the staff issued License Amendment No. 201 approving the AST, the total effective dose equivalent (TEDE) criteria, and the analysis methods, assumptions and inputs proposed in the February 7, 2001, letter as the new licensing basis for the assessment of radiological consequences of a design basis accident (DBA) at FCS. The FHA was part of this analysis and approval.

A summary of the FHA analysis, its inputs and results are provided below.

OPPD redefined the bounding source term inventory (for the worst case radionuclide activity) and this source term was documented in the NRC staff's safety evaluation that approved Amendment No. 201 dated December 5, 2001 (hereafter referred to as Reference 10.1 of the licensee's December 14, 2001, application). The development of the core inventory was based on maximum full power operation of the core at a power level equal to the current licensed rated thermal power including a two percent instrument error and current licensed values of fuel enrichment and burnup. The FCS equilibrium core inventory for radiological calculations was calculated using ORIGEN-S as documented in Reference 10.1 of the licensee's December 14, 2001, application. Reference 10.1 provides a table of the core inventory of dose significant isotopes relative for the FHA analysis. The proposed amendment changes are only applicable to core alterations and refueling operations based on the reanalysis of an FHA. The analysis performed is not applicable for mid-loop conditions or heavy load movement over the core operations; hence, the proposed changes are not applicable to mid-loop conditions and heavy load movements over the core. For mid-loop conditions and heavy load movements over the core, containment closure is required.

In addition, a determination of the radiological impact of an FHA was assessed using the new source term and using the analytical guidance from RG 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors." In accordance with Reference 10.1 of the licensee's December 14, 2001, application, it was documented that the FHA analysis was to calculate the control room and site boundary dose due to airborne radioactivity releases following an FHA in containment. The International Commission on Radiological Protection (ICRP) 30 dose conversion factors were used in the reanalyzed FHA. The analysis performed followed the guidance provided in RG 1.183 for FHA calculations; exceptions noted in Reference 10.1 of the licensee's December 14, 2001, application are repeated herein:

- a. The site boundary and control room breathing rates "traditionally acceptable" to the NRC in accident analyses were rounded up from their traditional values when presented in RG 1.183. The FCS accident analyses, which were initiated prior to the release of RG 1.183, utilize the traditional breathing rates, which had been noted in Draft Guide (DG) 1081. The impact on the dose analyses due to the usage of the traditional breathing rates is negligible.
- b. To account for fuel conditions outside of the bounds of RG 1.183, conservative estimates of FCS specific fuel gap fractions are utilized (i.e., double that of values noted in Table 3 of RG 1.183) for non-LOCA events.
- c. A loss of offsite power (LOOP) is not assumed with the FHA. As documented in Reference 10.1 of the licensee's December 14, 2001, application, an FHA cannot cause a LOOP; consequently this analysis did not address the potential effect of a LOOP (per NRC Information Notice 93-17, "Safety Systems Response to Loss of Coolant and Loss of Offsite Power").

Table 1 below lists some of the key assumptions/parameters that were documented in Reference 10.1 of the licensee's December 14, 2001, application for the radiological consequences assessment of an FHA in containment.

Table 1  
Analysis Assumptions & Key Parameter Values for a Fuel Handling Accident in Containment

Power Level	1530 MWth
Number of Damaged Fuel Assemblies	1
Total Number of Fuel Assemblies	133
Decay Time Prior to Fuel Movement	72 hours
Radial Peaking Factor	1.8
Fraction of Core Inventory in Gap	I-131 (16%) Kr-85 (20%) Other Noble Gases (10%) Other Halides (10%) Alkali Metals (24%)
Equilibrium Core Activity	See Reference 10.1 of the licensee's December 14, 2001, application

Iodine Form of Gap Release Before Scrubbing	99.85% Elemental 0.15% Organic
Scrubbing Decontamination Factors	Elemental Iodine (500) Organic Iodine (1) Noble Gas (1) Particulates ( $\infty$ ) PUFF
Rate of Release from Fuel Environmental Release Rate	All airborne activity in a 2-hour period
<u>Environmental Release Point</u> Accident in Containment	Containment Wall
<u>Control Room (CR) Emergency Ventilation</u> CR emergency ventilation placed in operation prior to fuel movement	
<u>Atmospheric Dispersion Factors (m<sup>3</sup>/sec) (Release Point is Containment Wall)</u>	
Exclusion Area Boundary (EAB)	(0-2 hours) 2.56E-04
Low Population Zone (LPZ)	(0-2 hours) 2.51E-05 (0-8 hours) 7.29E-06 (8-24 hours) 4.83E-06 (24-96 hours) 1.98E-06 (96-720 hours) 5.49E-07
Control Room	(0-2 hours) 4.87E-03 (2-8 hours) 4.19E-03 (8-24 hours) 2.11E-03 (24-96 hours) 1.61E-03 (96-720 hours) 1.35E-03
<u>Control Room Parameters</u>	
Free Volume	45,100 ft <sup>3</sup>
Unfiltered Normal Operation Intake	1000 cfm +/-10%
Emergency Intake Rate	1000 cfm +/-10%
Emergency Recirculation Rate	1000 cfm +/-10%
Emergency Intake Filter Efficiency	99% (iodine and particulates)
Emergency Recirculation Filter Efficiency	99% (iodine and particulates)
Unfiltered Inleakage	38 cfm
Occupancy Factors	0-24 hours (1.0) 1-4 days (0.6) 4-30 days (0.4)
Operator Breathing Rate	0-30 days (3.47E-04 m <sup>3</sup> /sec)

By procedure, fuel handling activities in the containment cannot be initiated until 72 hours after reactor shutdown. It is postulated that an FHA results in the damage of one (1) fuel assembly, thus releasing all of the fuel gap activity associated with that assembly. As discussed above, the gap fractions utilized for non-loss-of-coolant accident (LOCA) analyses at FCS are twice that recommended by RG 1.183. The activity (consisting of noble gases, halogens, and alkali metals) is released in a puff to the reactor cavity, which has a minimum of 23 feet of water above the reactor vessel flange.

The radioiodine released from the fuel gap is assumed to be 95 percent cesium iodine (CsI), 4.85 percent elemental, and 0.15 percent organic. Due to the acidic nature of the water in the reactor cavity (pH less than 7), the CsI will immediately disassociate, thus, changing the chemical form of iodine in the water to 99.85 percent elemental and 0.15 percent organic. Based on decontamination factors of 500 and 1 for the elemental and organic iodines, respectively, the chemical form of the iodines above the reactor cavity is 57 percent elemental and 43 percent organic.

Noble gas and unscrubbed iodines rise to the water surface where they are mixed in the available air space. All of the alkali metals released from the gap are retained in the reactor cavity water. Since the containment is assumed open, and there are no means of isolating the FHA, all of the airborne activity resulting from the FHA is exhausted out of the containment in a period of two hours.

For analysis reasons, the containment purge exhaust flow is considered operative during fuel movement in containment. This exhaust flow is released to the environment via the auxiliary building vent stack. However, since the containment is open, containment releases could occur from anywhere along the containment wall (e.g., via the equipment hatch or other penetrations). Because the location of the release is unknown, the worst case dispersion factors ( $\chi/Q$ ) are used in this analysis, i.e., those associated with the containment wall.

The event is based on a 2-hour release. The worst 2-hour period for the EAB is the 0 to 2-hour period. As documented in Reference 10.1 of the licensee's December 14, 2001, application, the 2-hour delay previously associated with manual alignment/repair of the recirculation damper for the CR ventilation is not applicable for this event. Per procedure, fuel movement in the containment cannot be initiated prior to placing the CR in an emergency ventilation mode. Consequently, automatic initiation of CR emergency ventilation scenarios are not applicable to an FHA in containment. The EAB, LPZ, and CR dose following an FHA in containment are presented below.

#### Fuel Handling Accident in Containment

EAB Dose (rem)	1.5 <sup>1</sup> -	Regulatory Limit (rem) 6.3
LPZ Dose (rem)	0.5 <sup>2</sup> -	Regulatory Limit (rem) 6.3
Control Room Dose (rem)	0.5 <sup>3</sup> -	Regulatory Limit (rem) 5.0

<sup>1</sup> Dose rounded to the nearest 0.5 rem (TEDE); EAB dose based on the worst 2 hours following the event, which for this event is 0 to 2 hours.

<sup>2</sup> Dose rounded to the nearest 0.5 rem (TEDE); LPZ dose based on the duration of the release.

<sup>3</sup> Dose rounded to the nearest 0.5 rem for 30-day integrated control room dose (TEDE).

The rounded-up doses calculated and shown above (from Reference 10.1 of the licensee's December 14, 2001, application) indicate that the dose consequences to EAB, LPZ, and CR are well within current regulatory limits even without crediting any containment or restriction of fission products. Therefore, with implementation of the AST methodology as documented in Reference 10.1 of the licensee's December 14, 2001, application, refueling operations at FCS can be carried out with the containment equipment hatch, the PAL doors, and other penetrations open without exceeding the regulatory dose requirement, should an FHA occur. This analysis was approved in License Amendment No. 201.

### 3.2 Administrative Controls

The licensee's commitment to administrative controls regarding open containment penetrations was emphasized in this review. While the licensee concluded that the release of fission products, subsequent to an FHA, will result in doses well within the dose criteria specified in 10 CFR 50.67, the prompt closure of containment penetrations will minimize the release of fission products (defense-in-depth). The administrative controls most important to this review were the capability to close the equipment hatch or equipment hatch enclosure room doors, PAL and open penetrations promptly and the ability to monitor possible radioactive releases.

During fuel handling or core alterations, the licensee must be able to effect prompt closure of the containment penetrations. The licensee states that approximately an hour would be a sufficient period to complete closure of the equipment hatch or equipment hatch enclosure room doors, PAL and open penetrations, including assembly of the personnel. The equipment hatch enclosure room provides a sufficient barrier to minimize fission product release should there be insufficient time to close the equipment hatch. The closure of the equipment hatch enclosure room doors will enable the ventilation systems to draw the release from an FHA in the proper direction such that it can be treated and monitored. In order to maintain this prompt closure time, the licensee committed to implement several important procedures or practices. Although the analysis shows that these commitments are not required to meet regulatory requirements, they will be put in place to minimize fission product release in the event of an FHA. OPPD has made formal commitments for administrative controls as follows:

1. The equipment hatch enclosure (Room 66) doors or the equipment hatch and one door in the PAL are capable of being closed in less than one hour of an FHA.
2. The equipment hatch enclosure (Room 66) doors or the equipment hatch and one door in the PAL shall not be obstructed unless capability for rapid removal of obstructions is provided (such as quick disconnects for hoses).
3. Penetrations providing direct access from the containment atmosphere to the outside atmosphere shall be capable of being closed on one side in less than one hour of an FHA. In addition, these valves still receive an VIAS for automatic closure.
4. An individual or individuals shall be designated and available during core alterations and refueling operations, capable of closing the equipment hatch enclosure (Room 66) doors or the equipment hatch, one door in the PAL, and penetrations that provide direct access from the containment atmosphere to the outside atmosphere.

These administrative controls will be put in place through plant procedures. These administrative controls will be required as part of the implementation of the TS and to be in place prior to any core alterations or refueling operations.

Regulatory Analysis Summary Table

TS#	Regulatory Requirements	Design Basis	Analysis (linked to Design Basis)	Licensee Actions
2.8.2(1)	10 CFR 50.67 and RG 1.183	Radiological dose consequences as a result of FHA: a. EAB/LPZ 6.3 rem (TEDE) b. CR operators 30-day integrated dose: 5.0 rem (TEDE)	Reference 10.1 of licensee's December 14, 2001, application and Section 5.0 of this amendment request: a. EAB 1.5 rem (TEDE) b. LPZ 0.5 rem (TEDE) c. CR operator 0.5 rem (TEDE)  Note - All values rounded-up as noted in Section 5.0.	Although the analysis shows actions not necessary to meet regulatory requirements, administrative controls established for "defense-in-depth".
2.8.2(3)	10 CFR 50.67 and RG 1.183	Same as above.	Same as above.	Same as above.

Licensee compliance with General Design Criterion (GDC) 64 will ensure adequate monitoring of effluents from the open containment penetrations. The licensee stated that they have incorporated these changes in the TS Bases and will implement them in plant procedures before any future core alterations. The staff finds these changes are consistent with the guidelines provided in TSTF-68 and 312. However, the proposed change is not consistent with TSTF-51. To clarify the applicability statement, the staff has added a footnote to state that "The core must be sub-critical for at least 72 hours before core alteration and refueling operations are allowed." The addition of this note captures the intent of the TSTF-51 for restricting core alterations and refueling operations before the fuel has decayed to a point where an FHA will result in doses well within the guideline values specified in 10 CFR 100 even without containment enclosure capability. By a memorandum dated March 25, 2002, the staff docketed an E-mail dated March 5, 2002, in which OPPD agreed to this change.

As stated in Section 3.1, refueling operations at FCS can be carried out with the containment equipment hatch, the PAL doors, and other penetrations open without exceeding the regulatory

dose requirement, should an FHA occur. In addition, the staff has found the licensee's proposed administrative controls provide defense-in-depth to protect the public should an FHA occur and has concluded that these administrative controls provide an adequate means for supporting the proposed TS changes.

### 3.3 Change to the Bases Sections

Bases Sections 2.8.2(1), 2.8.2(2), and 2.8.2(3) have been revised to reflect the proposed TS changes. The staff has reviewed these Bases changes and has no objections to them.

### 4.0 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.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (67 FR 2926). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 6.0 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.

Principal Contributor: A. Wang

Date: March 26, 2002