From:	"JAWORSKI, RICHARD L" <rjaworski@oppd.com></rjaworski@oppd.com>
То:	"Alan Wang" <abw@nrc.gov></abw@nrc.gov>
Date:	3/5/02 3:59PM
Subject:	RE: Acceptance of Proposed Footnote to Containment Closures LAR

Alan,

The proposed change to Tech Spec 2.8.2(1) is acceptable to OPPD. The attachment reflects my understanding of the proposed change.

## << Proposed NRR LAR II.doc>>

Richard L. Jaworski Supervisor of Nuclear Licensing Omaha Public Power District Fort Calhoun Station Phone: 402-533-6833 Pager 402-561-3642 Fax: (402) 533-7291 Email: RJaworski@OPPD.com

> ----- Original Message-----

- > From: Alan Wang [SMTP:ABW@nrc.gov]
- > Sent: Tuesday, March 05, 2002 9:49 AM
- > To: JAWORSKI, RICHARD L
- > Subject: Re: Acceptance of Proposed Footnote to Containment
- > ClosuresLAR
- >

> Rich, this is the wrong TS. The TS is 2.8.2(1). TS 2.8.2(2) can

> remain as is as far as we are concerned. As discussed this will not

> work for 2.8.2(1) because if you make these changes you also need to

> change the equipment hatch wording. What I proposed yesterday was add

> a footnote to the applicability of 2.8.2(1) stating that:

>

> \*The core must be subcritical for at least 72 hours before core

> alteration and refueling operatons are allowed."

>

> The reviewer has told he would accept this. He wants it clearly

> stated in the TS that fuel cannot be moved for 72 hours. That is his

> main issue with the current wording. You can use the "recently

> irradiated fuel " in 2.8.2(1) but that requries that the equiment

> hatch wording revert to the current TS. If you have any questions

> call me. Alan

>

> >>> "JAWORSKI, RICHARD L" <rjaworski@oppd.com> 03/05/02 09:27AM >>> > Alan,

>

> The attachment contains my understanding of the proposed footnote for

> TS

> 2.8.3(3). If this is what is proposed, it is acceptable to OPPD.

> Note

> again, this is still more liberal than our proposed amendment. We

> would

> not handle fuel this soon.

>

> <<Proposed NRR LAR Changes.doc>>

>

- > Richard L. Jaworski
- > Supervisor of Nuclear Licensing
- > Omaha Public Power District
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**CC:** "BYRNE, THOMAS R" <trbyrne@oppd.com>, "FRANS, MARK T" <mfrans@oppd.com>, "CAVANAUGH, GARY R" <gcavanaugh@oppd.com>

## Revised NRR Proposed Text for TSTF Issue TECHNICAL SPECIFICATIONS

## 2.0 LIMITING CONDITIONS FOR OPERATION

2.8 Refueling 2.8.2 Refueling Operations – Containment

2.8.2(1) Containment Penetrations

Applicability\*

Applies to containment penetrations in MODE 5 during CORE ALTERATIONS and REFUELING OPERATIONS inside containment.

\*The core must be sub-critical for at least 72 hours before core alteration and refueling operations are allowed.

## Objective

To minimize the consequences of an accident occurring during CORE ALTERATIONS and REFUELING OPERATIONS inside containment that could affect public health and safety.

Specification

The containment penetrations shall be in the following status:

- a. The Equipment Hatch Enclosure (Room 66) doors or the equipment hatch shall be capable of being closed;
- b. One door in the Personnel Air Lock shall be capable of being closed; and
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere either:

1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or

2. capable of being closed.

Note - Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.

Required Actions

(I) With one or more containment penetrations not in required status, suspend CORE ALTERATIONS and REFUELING OPERATIONS within containment immediately.

2-39 b

Amendment No. 188