

August 23, 2002

APPLICANT: Omaha Public Power District

FACILITY: Fort Calhoun Station, Unit 1

SUBJECT: SUMMARY OF TELECOMMUNICATION WITH OMAHA PUBLIC POWER DISTRICT (OPPD) TO DISCUSS DRAFT REQUESTS FOR ADDITIONAL INFORMATION (RAIs) FOR THE RENEWAL OF THE OPERATING LICENSE FOR FORT CALHOUN STATION, UNIT 1 (FCS)

On August 7, 2002, the NRC staff (the staff) and representatives from OPPD held a telecommunication (telecon) to discuss draft RAIs resulting from the staff's review of license renewal application (LRA) Sections 2.3.3.5, 2.3.3.8, and 2.3.3.9. A list of telecon participants is enclosed. OPPD has had an opportunity to review and comment on this summary.

2.3.3.5 Auxiliary Boiler Fuel Oil and Fire Protection Fuel Oil

2.3.3.5-D1 The system description for the Auxiliary Boiler Fuel Oil System in Section 2.3.3.5, "Auxiliary Boiler and Fuel Oil and Fire Protection Fuel Oil," lists the component types that are subject to an aging management review (AMR) and lists the intended function for the component. However, the LRA description does not provide sufficient information on the license renewal intended function of the system to determine, with reasonable assurance, that all the components required by 10 CFR 54.4 to be within the scope of license renewal and subject to an AMR, have been correctly identified. Please provide more information concerning the intended function(s) of this system. This information should be sufficient to justify the license renewal boundaries depicted on the referenced drawings and, to identify which specific components are within the scope of license renewal and subject to an AMR.

OPPD Response

The license renewal intended function of the Auxiliary Boiler Fuel Oil System is to provide a backup fuel oil supply to the diesel generators. Therefore, the components included in the scope of license renewal are the auxiliary boiler fuel oil storage tank; below grade piping associated with the tank; the filters; the pumps, valves, and piping between the auxiliary boiler fuel oil storage tank; and the auxiliary boiler fuel oil supply solenoid valve, since these comprise a pressure boundary that must be maintained to ensure the integrity of the supply system. In addition, the pump, the filters, and valves within the supply pipeline, from the auxiliary boiler fuel oil storage tank through the fuel oil transfer pump discharge valve, are included, since these comprise a pressure boundary to

transfer fuel oil from the auxiliary boiler fuel oil storage tank to the diesel generator fuel oil day tank.

Telecon Discussion and Conclusion

The applicant stated that they understood the RAI. This RAI will be renumbered "2.3.3.5-1."

2.3.3.8

Instrument Air

2.3.3.8-D1

Section 2.3.2.2 of the LRA states that containment isolation valves and associated piping in the compressed air system are subject to an AMR. LRA Section 2.3.3.8 states that the function of the compressed air system is to serve as the source of air for the instrument air system. Section 9.12 of the updated safety analysis report (USAR) describes the compressed air system to include air compressors, receivers, and air dryers. The staff believes these components, as well as valve bodies, piping, bolting, and valve operator bodies of the compressed air system, should be included within the scope of license renewal and should be subject to an AMR. The LRA description does not provide sufficient information on the license renewal intended function of the system to determine, with reasonable assurance, that all the components, required by 10 CFR 54.4 to be within the scope of license renewal and subject to an AMR, have been correctly identified. Please provide more information concerning the intended function(s) of this system. This information should be sufficient to justify the license renewal boundaries depicted on the referenced drawings, and identify which specific components are within the scope of license renewal and subject to an AMR.

OPPD Response

As described in section 9.12 of the USAR, the non safety-related compressed air system provides compressed air to the instrument air and the service air headers. The instrument air header provides air for pneumatic controls and the actuation of valves, dampers, and similar devices, as well as the fuel handling machine in containment. The compressed air system is not relied on to perform any intended function, as defined in 10 CFR 54.4. The air compressors are not loaded onto the emergency diesel generators and, during a design basis event, the compressed air system is assumed to be unavailable. Because the air supply is unavailable during a design basis event, all air-operated valves and dampers required to control design basis events are: (1) designed to fail to the required post-accident position on loss of air pressure, (2) provided with safety grade instrument air accumulators, or (3) provided with nitrogen backup systems.

Most of the instrument air system is not safety-related and does not meet the scoping criteria for license renewal. The portions of the instrument air system that meet the scoping requirements of 10 CFR 54.4 are those components required to operate engineered safety features or essential auxiliary support

system valves. For example, the system portion (from the check valves downstream through the accumulators), tubing, and components are part of the plant's engineered safeguards, and are included within the scope of license renewal. FCS doesn't have drawings showing individual valve actuators and their associated arrangement of instrument air valves, filter regulators, and accumulators. Instead, there is a single drawing that shows the typical configuration of components and a schedule identifying the individual components. That drawing is C-4175, Sh.1, which was included with the drawings submitted with the LRA. It shows how the boundaries for the typical arrangements were scoped. The boundaries were determined to occur at the check valve or trip valve, as applicable. The complete list of those components is contained in the on-site documentation for the instrument air system. For this system, the component types determined to be in scope are accumulators (tanks), bolting, filter housings, pipes and fittings, tubing, valve bodies, and valve operators. Pressure boundary is the only intended function identified.

Telecon Discussion and Conclusion

The applicant stated that they understood the RAI. This RAI will be renumbered "2.3.3.8-1."

- 2.3.3.8-D2** The system description in LRA Section 2.3.3.8, lists the instrument air system component types that are subject to an AMR and lists the intended function of the components. However, the LRA description does not provide sufficient information on the license renewal intended function of the system to determine, with reasonable assurance, that all the components, required by 10 CFR 54.4 to be within the scope of license renewal and subject to an AMR, have been correctly identified. Please provide more information concerning the intended function(s) of this system. This information should be sufficient to justify the license renewal boundaries depicted on the referenced drawings, and identify which specific components are within the scope of license renewal and subject to an AMR.

OPPD Response

See the response to 2.3.3.8-D1, above.

Telecon Discussion and Conclusion

The applicant stated that they understood the RAI. This RAI will be renumbered "2.3.3.8-2."

2.3.3.9 Nitrogen Gas

- 2.3.3.9-D1 The system description in LRA Section 2.3.3.9 describes the function of the nitrogen gas (NG) system to be to charge the safety injection tanks and to provide nitrogen cover for various tanks. However, the referenced drawings show the license renewal boundaries only going from the tanks to the first

isolation valve. Also, the LRA description does not provide sufficient information on the license renewal intended function of the system to determine, with reasonable assurance, that all the components, required by 10 CFR 54.4 to be within the scope of license renewal and subject to an AMR, have been correctly identified. Please provide more information concerning the intended function(s) of this system. This information should be sufficient to justify the license renewal boundaries depicted on the referenced drawings, and identify which specific components are within the scope of license renewal and subject to an AMR.

OPPD Response

The license renewal intended function of the NG system is to maintain the pressure boundary of the NG supply lines providing nitrogen to the various tanks. Therefore, the portions of the NG system within the scope of license renewal are the supply lines from the tanks, which are supplied with NG by this system, to the first isolation valve.

Telecon Discussion and Conclusion

The applicant stated that they understood the RAI. This RAI will be renumbered "2.3.3.9-1."

2.3.3.9-D2

On Drawing 11405-M-42, Sheet 1, location C3, valve NG-116 is highlighted as being within the scope of license renewal. The upstream and downstream side piping connected to NG-116 is not highlighted within the scope of license renewal. According to Table 2.3.3.9-1, the intended function of the valve body component group is pressure boundary. The failure to include the connected piping within scope and subject to an AMR could defeat that function. Provide justification for not including the connected piping within the license renewal boundary.

OPPD Response

The referenced drawing has an error at that location. The license renewal boundary flag on the downstream side of NG-116 should not end as shown, but continue on and direct the reader to the chemical and volume control system. The piping downstream of NG-116 is within the scope of license renewal. A corrected electronic drawing has been provided with this submittal.

Telecon Discussion and Conclusion

The applicant stated that they understood the RAI. This RAI will be renumbered "2.3.3.9-2."

/RA/

William F. Burton, Project Manager
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Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosure: As stated

cc w/enclosure: See next page

Telecon Discussion and Conclusion

The applicant stated that they understood the RAI. This RAI will be renumbered "2.3.3.9-2."

/RA/

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