

November 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 68023-0550

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 - ISSUANCE OF AMENDMENT  
RE: STEAM AND FEEDWATER SYSTEMS (TAC NO. MB5838)

Dear Mr. Ridenoure:

The Commission has issued the enclosed Amendment No. 212 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 July 23, 2002, as supplemented by letters dated October 8 and 28, 2002.

The amendment revises TS 2.5(1), "Steam and Feedwater Systems" to: (1) remove the requirement to demonstrate operability of redundant auxiliary feedwater system components, and (2) provide an allowed outage time to restore operability of the emergency feedwater storage tank. In addition to these revisions, TS 2.5 has been revised to be more consistent with NUREG-1432, "Improved Standard Technical Specification (ISTS) for Combustion Engineering Plants, Revision 2."

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. 212 to DPR-40  
2. Safety Evaluation

cc w/encls: See next page

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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. 212  
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 July 23, 2002, as supplemented by letters dated October 8 and 28, 2002, 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. 212, 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 120 days from the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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: November 26, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 212

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

2-28  
2-29

INSERT

2-28  
2-29

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 212 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 July 23, 2002, as supplemented by letters dated October 8 and 28, 2002, Omaha Public Power District (OPPD/the licensee) 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 requested changes will revise Technical Specification (TS) 2.5(1), "Steam and Feedwater Systems" to: (1) remove the requirement to demonstrate operability of redundant auxiliary feedwater system components, and (2) provide an allowed outage time to restore operability of the emergency feedwater storage tank. In addition to these revisions, TS 2.5 will be revised to be more consistent with NUREG-1432, "Improved Standard Technical Specification (ISTS) for Combustion Engineering Plants, Revision 2."

The supplemental letters dated October 8 and 28, 2002, 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 September 3, 2002 (67 FR 56327).

2.0 REGULATORY EVALUATION

The proposed TS Section 2.5 satisfies the regulatory requirements for equipment required for auxiliary feedwater (AFW) per 10 CFR 50.34, NUREG-0635, "NRC Requirements for Auxiliary Feedwater Systems," and NUREG-0737, "Clarification of TMI Action Plan Requirements." The proposed TS change resulted from a FCS Condition Report corrective action which identified that non-compliance with TS 2.5 caused the entry into TS 2.0.1 and generation of the required reports. The proposed changes to Section 2.5 will clarify the scope, allowed outage times, and actions required for the AFW system. Presently, Sections 2.5(1) and 2.5(2) do not address allowed outage times and provide no time for restoration of operability. The proposed changes to Section 2.5 will minimize the unnecessary entry into TS 2.0.1 and bring the FCS AFW system specifications into closer alignment with the ISTS. An allowed outage time or time to restore operability is also being added. These changes were made to prevent unnecessary perturbations of the plant and TS systems, specifically during conditions when one component is known to be inoperable. These changes will ensure that proper limiting conditions for operation (LCO) are entered for equipment or functional inoperability. The applicable modes and entry conditions are not being changed.

### 3.0 EVALUATION

The requested changes will revise TS 2.5(1), "Steam and Feedwater Systems" to: (1) remove the requirement to demonstrate operability of redundant auxiliary feedwater system components, and (2) provide an allowed outage time to restore operability of the emergency feedwater storage tank. In addition to these changes, TS 2.5 will be revised to be more consistent with NUREG-1432. The staff's evaluation of the proposed changes is provided below.

#### 3.1 Applicability

The Applicability section of TS 2.5 is being revised to be more consistent with the ISTS. The ISTS recommends that the Applicability for the AFW system be for Modes 1, 2, 3, and 4 when the steam generator is relied upon for heat removal. However, because the modes as defined for FCS are slightly different than those defined in the ISTS, a different Applicability statement was needed. The ISTS recommended ranges for reactor coolant temperature as compared to FCS TS as a function of Mode are:

<b>Mode</b>	<b>ISTS % Power</b>	<b>ISTS Temperature</b>	<b>FCS % Power</b>	<b>FCS Temperature</b>
1	5	NA	2	NA
2	5	NA	2	$T_{\text{cold}} \geq 515^{\circ}\text{F}$
3	NA	$T_{\text{avg}} \geq 350^{\circ}\text{F}$	NA	$T_{\text{cold}} \geq 515^{\circ}\text{F}$
4	NA	$200^{\circ}\text{F} \leq T_{\text{avg}} \leq 350^{\circ}\text{F}$	NA	$T_{\text{cold}} \leq 210^{\circ}\text{F}$

TS 2.1.1 establishes the modes and conditions when the steam generators are relied upon for heat removal from the reactor coolant system. The proposed TS 2.5 and Applicability statement are based on the FCS Updated Safety Analysis Report (USAR) which states that the AFW system is designed to supply feedwater to the steam generators whenever "reactor coolant temperature is above 300°F and the main feedwater system is not in operation, e.g., during startup, cooldown, or emergency conditions resulting in a loss of main feedwater."

As such, OPPD proposed the following Applicability statement:

When steam generators are relied upon for reactor coolant system heat removal.

The ISTS require that the AFW system be operable for Modes 1, 2, 3, and 4 when the steam generator is relied upon for heat removal. The FCS TS would require that the AFW system be operable above  $T_{\text{cold}} \geq 300^{\circ}\text{F}$  which is Modes 1, 2, 3, and between Modes 3 and 4 while  $T_{\text{cold}} \geq 300^{\circ}\text{F}$  and between Modes 3 and 4 when  $T_{\text{cold}} \leq 300^{\circ}\text{F}$  when the steam generator is relied upon for heat removal. Therefore, the FCS AFW applicability requirement for operability when  $T_{\text{cold}} \geq 300^{\circ}\text{F}$  is consistent with the ISTS applicability of Modes 1, 2, and 3 ( $T_{\text{avg}} \geq 350^{\circ}\text{F}$ ). The FCS AFW applicability requirement for operability with  $T_{\text{cold}} \leq 300^{\circ}\text{F}$  when the steam generator is relied upon for heat removal is also consistent with the ISTS requirement for Mode 4 ( $T_{\text{avg}} \leq 350^{\circ}\text{F}$ ) when the steam generator is relied upon for heat removal. In addition, similar to the ISTS, one turbine-driven AFW pump is required to be operable prior to when the reactor goes



critical when  $T_{\text{cold}} \geq 300^{\circ}\text{F}$  and one motor-driven AFW pump is required to be operable when  $T_{\text{cold}}$  is below  $300^{\circ}\text{F}$  and the steam generators are relied upon for heat removal.

Because the Modes as defined by the TS do not conform with the conditions described in the USAR or the ISTS, OPPD cannot use the ISTS Applicability statement. However, the staff has concluded that the proposed TS change meets the intent of the USAR. The proposed change clarifies the Applicability statement and is consistent with the USAR and ISTS based on the staff's comparison of the proposed Applicability statement with the ISTS Applicability statement and therefore, is acceptable.

### 3.1.1 Applicable Temperature $T_{\text{avg}}$ , $T_{\text{cold}}$ or $T_{\text{hot}}$

The current TS 2.5 does not define whether  $T_{\text{cold}}$  or  $T_{\text{hot}}$  should be used as the reference temperature for the TS. It only states that "the reactor coolant shall not be heated above  $300^{\circ}\text{F}$  unless....." The licensee has stated the ISTS refers to average reactor coolant temperature for the modes while the value in the proposed TS 2.5 proposes to use  $T_{\text{cold}}$  as the reference temperature. The staff notes that  $T_{\text{hot}}$  is the most direct indication of RCS temperature for determination of the need for the AFW system. By letter dated October 28, 2002, the licensee stated that when the RCS temperature approaches  $300^{\circ}\text{F}$  during plant shut down and startup, the difference between RCS  $T_{\text{hot}}$  and  $T_{\text{cold}}$  is less than  $2^{\circ}\text{F}$ . This difference is close to the accuracy of the temperature instrument. Thus, the temperature specified in the proposed TS ( $T_{\text{cold}}$ ) is essentially equivalent to  $T_{\text{hot}}$  or  $T_{\text{avg}}$ . This conclusion is supported by data taken during the shutdown and startup of the plant for the Spring 2002 refueling outage.

The licensee has also provided the following arguments that the use of  $T_{\text{cold}}$  will provide more consistency with current FCS operational practices:

1. The current plant procedures for implementation of TS 2.5 currently use  $T_{\text{cold}}$ .
2. TS 2.1.1(3) also establishes that the shutdown cooling be OPERABLE at temperatures less than  $300^{\circ}\text{F}$   $T_{\text{cold}}$ . This value is based upon the design of the FCS shutdown cooling system. As the shutdown cooling system is not designed to be operated above  $300^{\circ}\text{F}$ , specifying a different value for the AFW system could create a potential area of non-compliance with TS 2.1.1.
3. The additional conditional statement "without reliance on the steam generators for decay heat removal" which is equivalent to the note in ISTS Section 3.7.5, "Applicability," assures that the AFW trains are operable regardless of the temperature specified in the specification.
4. If different temperatures were established, then the operator could unknowingly violate one or the other of TS 2.1.1 or 2.5, for example, by not having the AFW OPERABLE when it must be operable to declare the reactor coolant loop(s) operable.
5. Even if the value in TS 2.5 was changed to one of these other values, the AFW system must be operable to support the requirements of TS 2.1.1 and, therefore, would still need to be operable whenever the RCS ( $T_{\text{cold}}$ ) is at or above  $300^{\circ}\text{F}$ .

Based on the minimal difference between  $T_{\text{cold}}$  and  $T_{\text{hot}}$  and  $T_{\text{avg}}$  at this temperature level (300°F) and the licensee's request for consistency based on current operational considerations, the staff concludes that the use of  $T_{\text{cold}}$  for proposed TS 2.5 is acceptable.

### 3.2 Current TS 2.5(1)

TS 2.5(1) has been changed to TS 2.5.(1)A, B, C, D and (2). This specification requires that two AFW trains be operable when  $T_{\text{cold}}$  is above 300°F. The discussion of the changes are provided below.

#### 3.2.1 TS 2.5(1)A

OPPD has added a TS for an inoperable steam supply with a seven day completion time. The proposed TS change is acceptable based on the following reasons: there are redundant steam supplies to the turbine driven AFW pump; there is a redundant operable motor driven AFW pump; and there is a low probability of an event requiring the inoperable steam supply to the turbine driven AFW pump. A limitation time of 10 days has been proposed based on entering both TS 2.5.(1)A and B concurrently. The 10 days is based on the ISTS completion times of 7 days and 3 days respectively for entrance into TSs 2.5.(1)A and B. For FCS, the staff stated that the limitation time allowed for this specified condition should be 8 days instead of 10 days, as the completion time is 1 day for TS 2.5(1)B instead of 3 days. By letter dated October 8, 2002, OPPD revised the proposed limitation time from 10 days to 8 days. Based on the above, the staff concludes that the proposed TS change is acceptable.

#### 3.2.2 TS 2.5(1)B

This proposed change addresses the allowed outage times and completion times for restoration of equipment. The current TS 2.5(1) only defines an allowed outage time for Modes 1 and 2. For all other conditions TS 2.0.1 applies. OPPD has proposed new TS requirements and action statements for restoration of the AFW system to minimize the need to enter TS 2.0.1. OPPD has attempted to make these changes consistent with the ISTS. However, the current allowed outage time of 24 hours has not been changed. In addition, the requirement to "demonstrate operability," which has been interpreted as physically operating the redundant component is being removed. This is consistent with the staff's philosophy on testing of a redundant train while one train is inoperable. Since the times for this specification are consistent with the current TS and those established in FCS TS 2.0.1, which is presently invoked if operability is not restored, the staff concludes that the proposed TS change is acceptable.

#### 3.2.3 TS 2.5(1)C

When a required action cannot be completed the plant must be placed in a Mode in which the LCO does not apply. OPPD has proposed the following completion times if the required actions in TS 2.5 cannot be met: FCS must be placed in Mode 2 in 6 hours, in Mode 3 in the next 6 hours and be less than 300°F without reliance on the steam generators for decay heat removal in the next 18 hours. The proposed allowed completion times are based on operating experience to reach the required conditions, for which the steam generators are not relied upon for reactor coolant system decay heat removal, in an orderly manner without challenging the unit. Since the current TS 2.5 has no completion times, the words in TS 2.0.1, were the

controlling TS. Based on the above and given that these completion times are consistent with the current requirements, the staff concludes that the TS change is acceptable.

### 3.2.4 TS 2.5(1)D

On the loss of both AFW trains, the current TS would place the FCS plant in TS 2.0.1. Therefore, OPPD has proposed a new required action for the condition where all (both) AFW trains are inoperable. With both AFW trains inoperable, FCS is in a seriously degraded condition with no safety-related means for conducting a controlled cooldown and only limited means for conducting a cooldown with nonsafety grade equipment. In such a condition, the plant should not be perturbed by any action, including a power change, that might result in a trip. As such, the proposed TS would suspend TS 2.0.1 and all TS actions requiring mode changes until one AFW train is restored to operable status. The seriousness of this condition requires that the plant immediately start to restore one AFW train to operable status. OPPD has proposed this TS, to be consistent with the ISTS, which requires the plant to immediately initiate actions to restore one train of AFW while suspending all mode changes. Based on the above, the staff concludes that the proposed TS is acceptable.

### 3.2.5 TS 2.5(2)

OPPD has added this TS to require the motor-driven AFW train to be operable when  $T_{\text{cold}} \leq 300^{\circ}\text{F}$  and the SGs are relied upon for heat removal. This is a more restrictive TS as the previous TS did not require the motor-driven AFW train to be operable when  $T_{\text{cold}} \leq 300^{\circ}\text{F}$ . When  $T_{\text{cold}} \leq 300^{\circ}\text{F}$ , the only AFW train available is the motor-driven AFW train. With the motor-driven AFW train inoperable, the FCS is in a seriously degraded condition with no safety-related means for conducting a controlled cooldown and only limited means for conducting a cooldown with nonsafety grade equipment. In such a condition, the plant should not be perturbed by any action, including a power change, that might result in a trip. As such, the proposed TS would suspend TS 2.0.1 and all TS actions requiring mode changes until the motor-driven AFW train is restored to operable status. The seriousness of this condition requires that the plant immediately start to restore one motor-driven AFW train to operable status. OPPD has proposed this TS, to be consistent with the ISTS, which requires the plant to immediately initiate actions to restore the motor-driven AFW train while suspending all mode changes. Based on the above, the staff concludes that the proposed TS is acceptable.

### 3.3 Current TS 2.5(2)

Current TS 2.5(2) has been renumbered to TS 2.5(3). In addition, an allowed outage time, actions, and completion times for restoration of the emergency feedwater storage tank (EFWST) have been established. Current TS 2.5(2) does not define an allowed outage time for the EFWST, so TS 2.0.1 must be applied. To minimize the need to enter TS 2.0.1, OPPD has proposed a new TS requirement and action statements for restoration of the EFWST. OPPD has attempted to make these changes consistent with the ISTS. With the EFWST inoperable, the 4 hour completion time and once every 12 hours thereafter, for verifying a backup water supply is reasonable based on operating experience. Verifying the backup water supply every 12 hours is adequate to ensure the backup water supply continues to be available. The current allowed outage time of 24 hours has not been changed. As the times for this specification are consistent with the current TS and those established in TS 2.0.1, which is presently invoked if

operability is not restored, and is more restrictive than the ISTS, the staff concludes that the proposed TS change is acceptable.

### 3.4 Current TS 2.5(3)

OPPD has proposed to delete current TS 2.5(3). TS 2.5(3) established the requirements for those valves, interlocks, and piping required to function during accident conditions associated with, and necessary for the AFW pumps to be operable. In addition, it assured that manual valves that could interrupt AFW flow be locked in their required position. TS 2.5(1) now refers to an AFW "train" rather than AFW "pump." Therefore, operability requirements now established in TSs 2.5(1) and (2) cover the pump and all associated components making current TS 2.5(3) redundant, and no longer necessary. In addition, those valves that are presently locked are part of several FCS surveillance procedures and station administrative controls standing orders. The AFW flow path is maintained by FCS procedures OP-ST-AFW-0001, "Auxiliary Feedwater System Valve Alignment Check," and SO-O-44, "Administrative Controls for the Locking of Components," as required by TS 3.9.1. Procedure OP-ST-AFW-0001 is a monthly test that ensures the AFW flow path to the SGs. Procedure SO-O-44 is used to minimize the probability of an inadvertent misalignment or unauthorized operation of a locked component not immediately detectable from the control room which could render the AFW flow paths inoperable. In accordance with 10 CFR 50.59, removal of these locked valves from these procedures would be considered "adverse" and, in many cases, require NRC approval prior to implementation, unless justification could be provided that unlocking these valves had "less than minimal" effect upon accidents, malfunctions, and/or consequences of SSCs affecting design functions.

The staff agrees that the current plant surveillances and procedures assure that AFW flow path will be maintained and therefore, the staff concludes that TS 2.5(3) can be deleted. In addition, the deletion of this specification is consistent with the ISTS.

### 3.7 TS 2.5(4)

The proposed change to TS 2.5(4) adds the condition for operability (operable when  $T_{\text{cold}}$  is above 300°F). This is necessary to be consistent with the changes to the format of TS 2.5(1) to include the condition for operability in the specification. This change is editorial in nature, and therefore is acceptable.

### 3.8 Change to Bases Section

Bases Section 2.5, "Steam and Feedwater Systems," has 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 56327). 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: November 26, 2002