

March 14, 2003

LICENSEE: 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 8, 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 2.3.3.2, 2.3.3.15, and 2.3.3.16. A list of telecon participants are enclosed. OPPD has had an opportunity to review and comment on this summary.

2.3.3.2 Spent Fuel Pool Cooling

2.3.3.2-D1 Section 9.6.2 of the Fort Calhoun Updated Safety Analysis Report (USAR) states that the fuel transfer canal drain pumps are utilized to provide spent fuel pool (SFP) make-up water from the safety injection and refueling water tank. Drawing 11405-M-11 for the safety injection system depicts a transition to the SFP cooling system at valve AC-307. However, drawing 11405-M-11 for the SFP cooling system does not depict a transition to the safety injection system at valve AC-307. Please clarify whether the embedded piping to the right of valve AC-307 on drawing 11405-M-11 is within the scope of license renewal and subject to an aging management review (AMR).

Telecon Discussion:

OPPD had no questions pertaining to this RAI. This RAI will be renumbered "2.3.3.2-1."

2.3.3.2-D2 License renewal boundary flags on drawing 11405-M-6, sheet (Sh.) 2 for the SFP cooling system, depict a transition from the SFP cooling system to the liquid waste disposal system at valve WD-1161 and a transition from the SFP cooling system to the safety injection system at valve WD-843. Drawing 11405-M-6, Sh. 2, for the liquid waste and safety injection systems shows a direct interface between the safety injection and the liquid waste disposal (LWD) systems at valve WD-843 with no indication of an interface with the SFP cooling system anywhere on the drawing. Although many drawings have multiple versions, each showing distinctly different information related to license renewal, the application fails to reference the associated drawings with uniquely identifiable drawing numbers. In order to determine whether the applicant has properly identified components that are within the scope of license renewal and subject to an AMR, the staff requests the following clarifications:

- (1) Does valve WD-843 serve as a boundary between the safety injection and LWD systems, as indicated in drawing 11405-M-6, sheet 2, for the LWD system, or does it serve as a boundary between the safety injection and spent fuel pool systems, as indicated in drawing 11405-M-6, Sh. 2, for the SFP system?
- (2) Is the piping between valves WD-843 and WD-1161, including the SFP branch line from drawing 11405-M-11, within the scope of license renewal and subject to an AMR?
- (3) Is valve WD-1161 in the LWD system, or does it serve as a boundary between the SFP and LWD systems? License renewal boundary flags on drawing 11405-M-6, Sh. 2 for the SFP cooling system, depict a transition from the SFP cooling system to the LWD system at valve WD-1161 and a transition from the SFP cooling system to the safety injection system at valve WD-843. Drawing 11405-M-6, Sh. 2, for the liquid waste and safety injection systems shows a direct interface between the safety injection and the LWD systems at valve WD-843 with no indication of an interface with the SFP cooling system anywhere on the drawing. Although many drawings have multiple versions, each showing distinctly different information related to license renewal, the application fails to reference the associated drawings with uniquely identifiable drawing numbers. Please resolve discrepancies between drawings and provide a clear and specific reference for each drawing associated with the LRA.

Telecon Discussion:

OPPD had no questions pertaining to this RAI. This RAI will be renumbered "2.3.3.2-2."

2.3.3.15 Raw Water

- 2.3.3.15-D1 Drawing 11405-M-100 depicts several license renewal boundary flags at locations E-8, D-8, and D-7 that are at design class boundaries not associated with an isolation valve. Please justify the location of these boundaries with regard to protection of essential systems from internal flooding or relocate the license renewal boundary to an appropriately located isolation valve.

Telecon Discussion:

OPPD had no questions pertaining to this RAI, and stated that boundary flags located at class boundaries reflect results of an engineering analysis and calculation that determined that the class boundaries are acceptable at a non-valve location. The staff asked that the response clarify the purpose of the engineering analysis and calculation, including the basis for the boundary locations (seismic, flooding, etc.). This RAI will be renumbered "2.3.3.15-1."

- 2.3.3.15-D2 Section 9.8.2 of the FCS USAR states that four raw water pumps are installed in the intake structure to provide screened river water to the component cooling heat exchangers. The intake structure screens perform an apparent intended function of preventing debris from reaching the pumps that could block flow to, or otherwise cause the failure of, the safety-related raw water system. However, LRA Table 2.3.3.15-1 does not identify the intake structure screens as components subject to an AMR. Please clarify whether the intake structure screens are subject to an AMR, or justify their exclusion.

Telecon Discussion:

OPPD had no questions pertaining to this RAI. This RAI will be renumbered "2.3.3.15-2."

2.3.3.16 Component Cooling

- 2.3.3.16-D1 Drawing 11405-M-12, Sh. 1, for the component cooling water system, depicts the sample chiller and the associated component cooling water supply and return piping at drawing location B-6 as outside the scope of license renewal. However, drawing 11405-M-12, Sh. 1, for the primary plant sampling system, depicts the sample chiller as within scope and notes a transition to the component cooling water system for the associated supply and return piping. It is unclear to the staff whether these components are within the scope of license [renewal] and subject to an AMR, the basis for their inclusion or exclusion, and to what system(s) these components belong (for the purposes of license renewal). Please clarify whether the sample chiller and the associated component cooling water supply and return piping are within the scope of license renewal and subject to an AMR, the basis for inclusion within scope and subject to an AMR, and for what system(s) these components are within scope and subject to an AMR, or justify their exclusion.

Telecon Discussion:

OPPD had no questions pertaining to this RAI. This RAI will be renumbered "2.3.3.16-1."

- 2.3.3.16-D2 Drawing 11405-M-119, for the component cooling water system, depicts the control element assembly seal coolers as within license renewal scope as part of the reactor vessel internals, and the associated component cooling water supply and return piping as within scope for the component cooling water system. However, LRA Table 2.3.1.1-1, which lists components comprising the reactor vessel internals, does not include the control element assembly seal coolers nor their intended function of maintaining the component cooling water system pressure boundary. Also, LRA Section 2.3.1.1, does not reference drawing 11405-M-119. Please clarify whether the control element assembly seal coolers are included within the scope of license renewal and subject to an AMR or justify their exclusion. In addition, please provide drawings and other design information for the control element assembly seal area that provides sufficient

detail to identify other potential intended functions of the seal cooler, such as reactor coolant system pressure boundary and heat transfer (i.e., the seal must be cooled to maintain reactor coolant system pressure boundary integrity).

Telecon Discussion:

OPPD had no questions pertaining to this RAI, and will clarify whether the seal cooler has a heat transfer intended function. This RAI will be renumbered "2.3.3.16-2."

- 2.3.3.16-D3 Drawing 11405-M-40, Sh. 1, for the component cooling water system, depicts the containment air cooling coils as within the scope of the containment heating, ventilation, and air conditioning system. However, drawing 11405-M-1, Sh. 1, which is referenced by the LRA for the containment heating, ventilation, and air conditioning system, does not clearly depict the containment air cooling unit interface with the component cooling water system such that the components subject to an AMR can be identified. As discussed in the staff's letter dated May 1, 2002, to the Nuclear Energy Institute and the Union of Concerned Scientists, "License Renewal Issue: Guidance on the Identification and Treatment of Housings for active Components," housings of active components, including heating and cooling coils, may perform a critical pressure retention and/or structural integrity function which, should that function not be maintained, could prevent the associated active component from performing its function. The staff believes that the containment air cooling coils provide such an intended function and are passive and long-lived. Therefore, the staff concludes that these components should be subject to an AMR. Please clarify whether the containment air cooling coils are subject to an AMR, or justify their exclusion.

Telecon Discussion:

OPPD had no questions pertaining to this RAI. This RAI will be renumbered "2.3.3.16-3."

- 2.3.3.16-D4 Drawing 11405-M-10, Sh. 2, for the component cooling water system, depicts the nitrogen pressurization line to the component cooling water surge tank as within the scope of the component cooling water system. However, drawing 11405-M-42, Sh. 1, which is referenced by the LRA for the nitrogen gas system, depicts the interfacing line within the scope of the nitrogen gas system, rather than the component cooling water system. Please resolve the discrepancy between these drawings.

Telecon Discussion:

OPPD had no questions pertaining to this RAI. This RAI will be renumbered "2.3.3.16-4."

- 2.3.3.16-D5 Drawing E-23866-210-120, Sh. 1A, for the chemical and volume control system identifies the letdown heat exchanger as within scope. However,

drawing 11405-M-10, Sh. 3, for the component cooling water system, fails to depict a transition to the chemical and volume control system at the letdown heat exchanger. In addition, drawing E-23866-210-120, Sh. 1A, for the chemical and volume control system and drawing E-23866-210-120, Sh. 1A, for the reactor coolant system are distinct license renewal drawings, but the LRA uses the identical reference number. Please clarify the noted discrepancies and clarify whether the component cooling water supply and return piping for the letdown heat exchanger are within the scope of license renewal and subject to an AMR.

Telecon Discussion:

OPPD had no questions pertaining to this RAI. This RAI will be renumbered "2.3.3.16-5."

- 2.3.3.16-D6 Drawing 11405-M-10, Sh. 3, for the component cooling water system, depicts a transition to the gaseous waste disposal system at the gas compressor seal water heat exchangers. However, drawing 11405-M-98, Sh. 1, for the gaseous waste disposal system fails to depict a transition to the component cooling water system at gas compressor seal water heat exchangers. Please resolve these discrepancies and clarify whether the subject components (gas compressor seal water heat exchangers, and associated component cooling water interfaces) are within the scope of license renewal and subject to an AMR. Drawing 11405-M-10, Sh. 3, for the component cooling water system depicts a transition to the gaseous waste disposal system at the gas compressor seal water heat exchangers. However, drawing 11405-M-98, Sh. 1, for the gaseous waste disposal system, fails to depict a transition to the component cooling water system at gas compressor seal water heat exchangers. Please resolve discrepancies between drawings.

Telecon Discussion:

OPPD noted that the RAI had some redundant wording, other than that, they had no questions pertaining to this RAI. The staff will remove the redundant wording. This RAI will be renumbered "2.3.3.16-6."

- 2.3.3.16-D7 Drawing 11405-M-10, Sh. 3, for the component cooling water system, depicts relief valves for shutdown cooling heat exchangers AC-4A and AC-4B and the SFP heat exchanger (valves AC-1026, AC-1027, and AC-1059, respectively) as gagged. However, neither the valves' inlet piping nor the valve bodies are indicated as being within the scope of license renewal and subject to AMR by red overprinting or an appropriate note. In addition, the gagging devices, which also perform an apparent pressure boundary intended function, are not listed in LRA Table 2.3.3.16-1 as being subject to an AMR. Please clarify whether the inlet piping, bodies, and gagging devices associated with the above-referenced valves are within the scope of license renewal and subject to an AMR, or justify their exclusion.

Telecon Discussion:

OPPD had no questions pertaining to this RAI and will clarify when the gagging devices change state, thus, confirming that the device is not subject to an AMR. If, however, the gagging devices are permanently in place, and their state never changes, the staff believes that the devices would be subject to an AMR. This RAI will be renumbered "2.3.3.16-7."

/RA/

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License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No.: 50-285

Enclosure: As stated

cc w/encl: See next page

Telecon Discussion:

OPPD had no questions pertaining to this RAI and will clarify when the gagging devices change state, thus, confirming that the device is not subject to an AMR. If, however, the gagging devices are permanently in place, and their state never changes, the staff believes that the devices would be subject to an AMR. This RAI will be renumbered "2.3.3.16-7."

/RA/

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Docket No.: 50-285

Enclosure: As stated

cc w/encl: See next page

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