

February 18, 2004

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 – REQUEST FOR ADDITIONAL  
INFORMATION ON LICENSE AMENDMENT REQUEST RELATED TO  
VARIOUS ADMINISTRATIVE TECHNICAL SPECIFICATION CHANGES  
(TAC NO. MC1535)

Dear Mr. Ridenoure:

By letter dated December 1, 2003, Omaha Public Power District (OPPD) submitted an application for amendment to Renewed Facility Operating License No. DPR-40 for the Fort Calhoun Station, Unit 1 (FCS). The license amendment request (LAR) proposes changes to the FCS Technical Specifications (TSs) to primarily make typographical changes and relocate material not required to be in the TSs. OPPD has proposed changes to the following TSs: (1) item 14 of Table 3-3 regarding testing of nuclear detector well cooling annulus exit air temperature detectors, (2) the title of item 10a.2 of Table 3-5, (3) TS Section 3.17(5)(ii), (4) TS Section 5.5, "Review and Audit," (5) TS Section 5.6, "Reportable Event Action," (6) TS Sections 5.7.1.b, 5.7.1.c, and 5.7.1.d, (7) TS Section 5.9.1.a, "Startup Report," and (8) TS Section 5.9.4.c, "Fire Protection Program Deficiency Report."

The staff has completed its preliminary review of this submittal and has determined it needs additional information to complete the review. Our request for additional information is enclosed. This request was discussed with Richard Jaworski of your staff and it was agreed that a response would be provided within 30 days of receipt of this letter.

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

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION ON LICENSE AMENDMENT REQUEST

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION, UNIT 1 (FCS)

DOCKET NO. 50-285

Omaha Public Power District's (OPPD) license amendment request (LAR) dated December 1, 2003, includes proposed technical specification (TS) changes to instrumentation surveillance requirements for cooling annulus exit air temperature (TS Table 3-3), changes to steam generator tubes (TS 3.17.5), changes to administrative control requirements for review and audit (TS 5.5), reportable event action (TS 5.6), safety limit violation (TS 5.7), and reporting requirements (TS 5.9), as well one change to correct a typographical error. To complete the review of the LAR, the staff requires clarifications regarding several changes as noted below.

1. Reportable Event Action (TS 5.6.1.a, 5.6.1.c), Reportable Event (TS 5.9.2)

The requirements of TS 5.6.1.a, 5.6.1.c, and TS 5.9.2 (reportable event notification requirements) are to be removed from the TSs. The staff notes that OPPD did not provide a discussion of the TS 5.9.2 changes in the LAR. Therefore, the staff requests justification for the proposed change be submitted for review and assessment.

2. Steam Generator Tubes Surveillance Requirements (TS 3.17(5)(iii))

The requirements of TS 3.17(5)(iii) are to be removed from the TSs and the associated Bases are to be updated with the same change. TS 3.17(5)(iii) requires that the results of the steam generator tube inspections, which fall into Category C-3 and require prompt notification of the Commission, shall be reported pursuant to Section 5.6 of the TS (reportable event action) prior to resumption of plant operation. OPPD states this is being done for consistency with removing TS 5.6, since the requirements of 10 CFR 50.72 and 50.73 are required to be met by the Fort Calhoun Station renewed operating license.

The staff notes that the request represents a change to the precedent established by the standard TS (STS) (NUREG-1432), TS 5.6.10, "Steam Generator Inspection Reports" which specifies that a licensee retain the current licensing basis regarding steam generator tube surveillance requirements, including any reports that may be required covering inspection, test, and maintenance activities. Reports are required to be submitted in accordance with 10 CFR 50.4. Therefore, the staff requests the licensee submit a request to revise the Administrative Controls TS to include a steam generator tube inspection report reporting requirement modeled after STS 5.6.10. This reporting requirement should include the licensee's current licensing basis regarding steam generator tube surveillance requirements and cover reporting requirements with regards to inspection, test and maintenance.

3. Review and Audit (TS 5.5), Reportable Event Action (TS 5.6.1.b) and Safety Limit Violation (TS 5.7.1.b, c and d)

The requirements of TS 5.5, 5.6.1.b and 5.7.1.b, 5.7.1.c and 5.7.1.d (review and audit functions) are proposed to be relocated to the Updated Safety Analysis Report. TSs 5.5, 5.6.1.b, 5.7.1.b, 5.7.1.c and 5.7.1.d (Administrative Control) contain provisions related to quality assurance requirements for operation of the facility. The proposed changes to the administrative control provisions may be eliminated if the allowance to implement quality assurance (QA) standards are properly structured in the QA Plan. Therefore, the staff requests documentation from OPPD to show that the QA Plan is adequately structured with regard to incorporating TSs 5.5, 5.6.1.b, 5.7.1.b, 5.7.1.c and 5.7.1.d and that the submittal be revised accordingly.