



444 South 16th Street Mall
Omaha NE 68102-2247

April 16, 2004
LIC-04-0046

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

- References:
1. Docket No. 50-285
 2. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk) dated July 25, 2003, Fort Calhoun Station Unit No. 1 License Amendment Request, "Staggered Integrated Engineered Safety Features Testing" (LIC-03-0084)
 3. Letter from NRC (Alan B. Wang) to OPPD (R. T. Ridenoure) dated March 16, 2004, Fort Calhoun Station Unit No. 1 - Request for Additional Information on License Amendment Request Related to Staggered Integrated Engineered Safety Features Testing (TAC No. MC0195) (NRC-04-036)

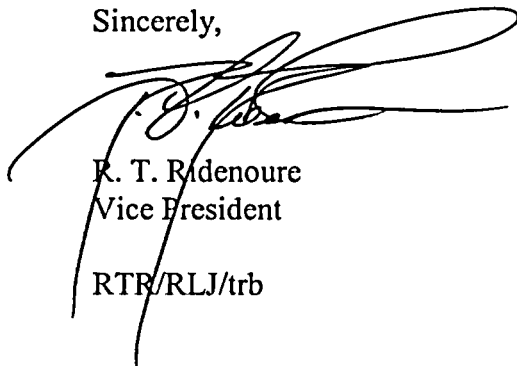
SUBJECT: Response to Requests for Additional Information on License Amendment Request Related to Staggered Integrated Engineered Safety Features Testing

In support of the License Amendment Request, "Fort Calhoun Station Unit No. 1 License Amendment Request, "Staggered Integrated Engineered Safety Features Testing" (Reference 2), the Omaha Public Power District (OPPD) provides the attached response to the Nuclear Regulatory Commission's (NRC's) Request for Additional Information of Reference 3.

I declare under penalty of perjury that the forgoing is true and correct. (Executed on April 16, 2004)
No commitments to the NRC are made in this letter.

If you have any questions or require additional information, please contact Dr. R. L. Jaworski of the FCS Licensing staff at (402) 533-6833.

Sincerely,



R. T. Ridenoure
Vice President
RTR/RLJ/trb

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Attachment: Response to Requests for Additional Information on License Amendment Request
Related to Staggered Integrated Engineered Safety Features Testing

c: B. S. Mallett, Regional Administrator, NRC Region IV
A. B. Wang, NRC Project Manager
J. G. Kramer, NRC Senior Resident Inspector
Division Administrator - Public Health Assurance, State of Nebraska

ATTACHMENT

RESPONSE TO NRC REQUESTS FOR ADDITIONAL INFORMATION ON LICENSE AMENDMENT REQUEST RELATED TO STAGGERED INTEGRATED ENGINEERED SAFETY FEATURES TESTING

NRC Question 1:

The proposed change will change the interval for the integrated [engineered safety features] ESF and [loss of offsite power] LOOP testing from each refueling outage for all trains to staggered refueling outages such that only one train will receive an Integrated ESF and LOOP test each refueling outage. [Fort Calhoun Station Unit No. 1] FCS has three trains. This will result in a change of testing each train from 18 months to 36 months.

- a. Confirm that all active contacts in the ESF and LOOP logic circuits will be tested no less than their present interval.
- b. If there are any active components that are only tested as a result of the integrated testing, describe those components and justify that the extended testing time will not degrade those components such as, but not limited to, degradation of the normally-open contacts from external events such a contact oxidation.

OPPD Response:

FCS has only two ESF trains. Per our phone call with the NRC dated January 7, 2004, it is the Omaha Public Power District's (OPPD's) understanding that these questions will be incorporated into the Electrical and Instrumentation and Controls Branch's review of WCAP-15830-P, Staggered Integrated ESF Testing, March 2003, Rev. 00 instead of as plant-specific questions.

NRC Question 2:

The [license amendment request] LAR proposes to include the main steam isolation valves (MSIV) in the staggered frequency basis by revising Section 3.8, "Main Steam Isolation Valves". Please confirm that both MSIVs will receive a full closure test each refueling outage in accordance with Section 3.8 and it is OPPD's intent to only stagger the testing of each train actuation signal.

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OPPD Response:

Westinghouse topical report WCAP-15830-P contains FCS-specific information in Section B. Table B-3.2a of the report provides a listing of FCS procedures that served as an input to WCAP-15830-P. WCAP-15830-P, Page B-17 lists test OP-ST-MS-3002, Main Steam System Category B Valve Exercise Test, which is performed on an 18 Month frequency. This test manually cycles the MSIVs using the control room switch. This test will continue to be performed on an 18 Month frequency.