

November 19, 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 (TAC NO. MC3217)

Dear Mr. Ridenoure:

By letter dated May 21, 2004, Omaha Public Power District (OPPD) submitted an amendment request for the Fort Calhoun Station, Unit 1, to modify the Basis of Technical Specification 2.4, "Containment Cooling," to allow containment spray pumps to be secured during a loss-of-coolant accident to minimize the potential for containment sump clogging when certain conditions are met. The staff has completed its preliminary review of this submittal and has determined it needs additional information to complete the review. The staff's request for additional information is enclosed. This request was discussed with Thomas Byrne 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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Omaha Public Power District
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Ft. Calhoun Station, Unit 1

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REQUEST FOR ADDITIONAL INFORMATION
TECHNICAL SPECIFICATION 2.4 BASIS CHANGE
OMAHA PUBLIC POWER DISTRICT
FORT CALHOUN STATION, UNIT NO. 1
DOCKET NO. 50-285

NRC Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized Water Reactors," required that operators of pressurized water reactors (PWRs) state that the emergency core cooling systems (ECCS) and the containment spray (CS) recirculation functions meet applicable regulatory requirements with respect to adverse post-accident debris blockage or describe interim compensatory measures to reduce the risk associated with the potentially degraded or non-conforming ECCS and CS recirculation functions. By letter dated May 21, 2004, Omaha Public Power District (OPPD) submitted an amendment request for the Fort Calhoun Station, Unit 1 (FCS) as part of its commitment made to Bulletin 2003-01. OPPD proposed to modify the Basis of Technical Specification 2.4, "Containment Cooling," to allow CS pumps to be secured during a loss-of-coolant accident (LOCA) to minimize the potential for containment sump clogging when certain conditions are met. The staff has completed its preliminary review of this submittal and has determined it needs the following additional information to complete the review.

1. For the manual operator actions required to reduce to one train of CS operation, are all required actions taken from the main control room? Are there any actions required to be taken from the plant (i.e., from local control stations)? Describe the actions to reduce to one CS train.
2. Using ANSI/ANS 58.8 guidance, the analysis on page 7 of the May 24, 2004, submission indicates that the estimated time for operators to take all the required actions that terminate the CS pumps is approximately four minutes. The licensee further states that the emergency operating procedures do not direct these actions until other, more time restrictive actions such as post-trip actions, safety function status checks, or tripping of the reactor coolant pumps are performed. However, the required actions (i.e., to terminate the CS pumps) are intended to be taken as soon as possible and prior to the recirculation actuation signal (RAS). Is terminating to one CS train "time sensitive"? How much time is there from when operators complete the more time restrictive actions until the RAS is received? Does this time vary as a function of the LOCA size or is it constant? If the time is variable, what is the shortest amount of time that operators will have to successfully complete the actions to terminate one CS train (i.e., will operators have at least four minutes to complete the required actions under all LOCA conditions)?