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LIC-04-0096
September 7, 2004

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

REFERENCE: Docket No. 50-285

SUBJECT: Fort Calhoun Station, Unit No. 1, Application for Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), the Omaha Public Power District (OPPDP) is submitting a request for an amendment to the technical specifications (TSs) for Fort Calhoun Station, Unit No. 1. The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports.

The change is consistent with NRC approved Revision 1 to industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides the proposed TS pages.

OPPDP requests approval of the proposed license amendment by April 15, 2005, with an implementation period of 60 days.

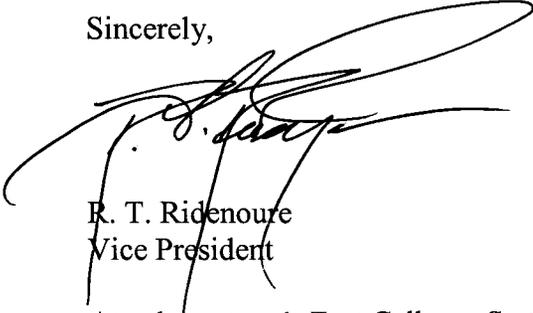
As stated in Attachment 1, OPPDP is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated State of Nebraska Official.

I declare under penalty of perjury that the foregoing is true and correct (Executed on September 7, 2004).

If you should have any questions regarding this submittal, please contact Tom Matthews at (402) 533-6938.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. T. Ridenoure', is written over a large, light-colored scribble or stamp.

R. T. Ridenoure
Vice President

Attachments: 1. Fort Calhoun Station's Evaluation
2. Markup of Technical Specification Pages
3. Proposed Technical Specification Pages

cc: Division Administrator - Public Health Assurance, State of Nebraska

**Fort Calhoun Station's Evaluation
For
Amendment of Operating License**

- 1.0 INTRODUCTION
 - 2.0 DESCRIPTION OF PROPOSED AMENDMENT
 - 3.0 BACKGROUND
 - 4.0 REGULATORY REQUIREMENTS AND GUIDANCE
 - 5.0 TECHNICAL ANALYSIS
 - 6.0 REGULATORY ANALYSIS
 - 6.1 VERIFICATION AND COMMITMENTS
 - 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION
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1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Technical Specification (TS) 5.9.1b for an annual report on occupational radiation exposures, and TS 5.9.1c for a monthly report of operating statistics and shutdown experience. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process (CLIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, and Amendment 228 (Reference 10.2), the proposed TS changes include:

TS 5.9.1b	Occupational Radiation Exposure Report	Not Used
TS 5.9.1c	Monthly Operating Report	Not Used

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

5.0 TECHNICAL ANALYSIS

The Omaha Public Power District (OPPD) has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. OPPD has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to Fort Calhoun Station, Unit No. 1 (FCS) and justify this amendment for the incorporation of the changes to the FCS TSs.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, OPPD is making the following regulatory commitments and verification:

1. OPPD is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).
2. FCS does not have different reactor types or both operating and shutdown reactors.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

OPPD has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. OPPD has concluded that the proposed determination presented in the notice is applicable to FCS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

OPPD has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. OPPD has concluded that the staff's findings presented in that evaluation are applicable to FCS and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIP. OPPD is not proposing significant variations or deviations from the TS changes described in TSTF-369 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067). OPPD is proposing to show TS 5.9.1b and TS 5.9.1c as "Not Used" rather than "Deleted" for consistency with Amendment 228 (Reference 10.2).

10.0 REFERENCES

- 10.1 Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067)
- 10.2 Letter from NRC (A. B. Wang) to OPPD (R. T. Ridenoure) dated July 23, 2004, "Fort Calhoun Station, Unit No. 1 - Issuance Of Amendment [228] Re: Various Administrative And Editorial Changes (Tac No. MC1535)"

MARKUP OF TECHNICAL SPECIFICATION PAGES

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

5.9 Reporting Requirements (Continued)

- b. ~~Not Used~~ Annual Occupational Exposure Report. An annual occupational exposure report shall be submitted on or before April 30 of each year. The report shall consist of a tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,^{3/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling outages. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- c. ~~Not Used~~ Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, with a copy to the appropriate Regional Office, no later than the fifteenth of each month following the calendar month covered by the report.

5.9.2 Not Used

5.9.3 Special Reports

Special reports shall be submitted to the appropriate NRC Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification where appropriate:

- a. In-service inspection report, reference 3.3.
- b. Tendon surveillance, reference 5.21.
- c. Containment structural tests, reference 3.5.
- d. DELETED
- e. DELETED
- f. DELETED
- g. Materials radiation surveillance specimens reports, reference 3.3.
- h. DELETED
- i. Post-accident monitoring instrumentation, reference 2.21
- j. Electrical systems, reference 2.7(2).

^{3/} This tabulation supplements the requirements of § 20.2206 of 10 CFR Part 20.

PROPOSED TECHNICAL SPECIFICATION PAGES

TECHNICAL SPECIFICATIONS

5.0 ADMINISTRATIVE CONTROLS

5.9 Reporting Requirements (Continued)

b. Not Used

c. Not Used

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- j. Electrical systems, reference 2.7(2).