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August 11, 2005
LIC-05-0070

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Reference: Docket No. 50-285

SUBJECT: Fort Calhoun Station Unit No. 1 License Amendment Request, "Application For Technical Specification Improvement to Add LCO 2.0.1(3) on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process"

Pursuant to 10 CFR 50.90, Omaha Public Power District (OPPDP) hereby proposes to make changes to the Fort Calhoun Station Unit No. 1 (FCS) Technical Specifications (TS). The proposed amendment would modify TS requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 2.0.1(3).

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides revised (clean) TS pages.

OPPDP requests approval of the proposed amendment by April 15, 2006. OPPDP requests 120 days to implement this amendment. The following commitment is made to the NRC in this letter:

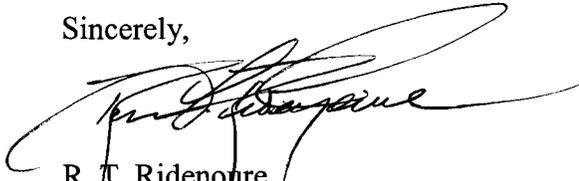
- OPPDP will establish the Technical Specification Bases for LCO 2.0.1(3) as adopted with the applicable license amendment. This regulatory commitment will be completed by the implementation date.

I declare under penalty of perjury that the foregoing is true and correct. (Executed on August 11, 2005).

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If you have any questions or require additional information, please contact Thomas R. Byrne at (402) 533-7368.

Sincerely,



R. T. Ridenoure
Vice President

RTR/TRB/trb

Attachments:

1. Omaha Public Power District Evaluation
 2. Markup of Technical Specification Pages
 3. Proposed Technical Specifications (clean)
- c: Division Administrator - Public Health Assurance, State of Nebraska

ATTACHMENT 1

Application For Technical Specification Improvement to Add LCO 2.0.1(3) on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process

- 1.0 DESCRIPTION
- 2.0 ASSESSMENT
- 3.0 REGULATORY ANALYSIS
- 4.0 ENVIRONMENTAL EVALUATION

Application For Technical Specification Improvement to Add LCO 2.0.1(3) on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process”

1.0 DESCRIPTION

The proposed amendment would modify technical specifications (TS) requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 2.0.1(3). The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-372 Revision 4. The availability of this TS improvement was published in the Federal Register on May 4, 2005 as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

The Omaha Public Power District (OPPD) has reviewed the safety evaluation dated November 24, 2004 as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-372. OPPD has concluded that the justifications presented in the TSTF proposal and the safety evaluation 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 TS.

2.2 Optional Changes and Variations

OPPD is not proposing any variations or deviations from the TS changes described in TSTF-372 Revision 4 or the NRC staff's model safety evaluation dated November 24, 2004. Administrative numbering changes have been made to accommodate the custom nature of the FCS TS.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

OPPD has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. OPPD has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to FCS and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on May 4, 2005 for this TS improvement, plant-specific verifications were performed as follows:

OPPD has established TS Bases for LCO 2.0.1(3) which provide guidance and details on how to implement the new requirements. LCO 2.0.1(3) requires that risk be managed and assessed. The Bases also state that while the Industry and NRC guidance on implementation of 10 CFR 50.65(a)(4), the Maintenance Rule, does not address seismic risk, LCO 2.0.1(3) should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative assessment of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function. Finally, OPPD is expected to have a Bases Control Program consistent with Section 5.5 of the STS. In conjunction with the proposed change, TS requirements for a Bases Control Program, consistent with the TS Bases Control Program described in Section 5.5 of the Combustion Engineering standard TS (STS), shall be incorporated into the FCS TS, if not already in the TS. OPPD currently has a TS Bases Control Program described in Section 5.20 of the FCS TS.

4.0 ENVIRONMENTAL EVALUATION

OPPD has reviewed the environmental evaluation included in the model safety evaluation dated November 24, 2004 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.

ATTACHMENT 2

Markup of Technical Specification Pages

TECHNICAL SPECIFICATIONS

2.0 LIMITING CONDITIONS FOR OPERATION

2.0.1 General Requirements

Applicability

Applies to the operable status of all systems, subsystems, trains, components, or devices covered by the Limiting Conditions for Operation.

Objective

To specify corrective measures to be employed for system conditions not covered by or in excess of the Limiting Conditions for Operation.

Specification

- (1) In the event a Limiting Condition for Operation and/or associated action requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in at least HOT SHUTDOWN within 6 hours, in at least subcritical and < 300°F within the next 6 hours, and in at least COLD SHUTDOWN within the following 30 hours, unless corrective measures are completed that permit operation under the permissible action requirements for the specified time interval as measured from initial discovery or until the reactor is placed in an Operating Mode in which the specification is not applicable. Exceptions to these requirements shall be stated in the individual specifications.
- (2) When a system, subsystem, train, component, or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in at least HOT SHUTDOWN within 6 hours, in at least subcritical and <300°F within the next 6 hours, and in at least COLD SHUTDOWN within the following 30 hours. This specification is not applicable in Operating Modes 4 or 5.
- (3) *When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:*
 - a. *the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or*

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- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.*

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

Basis

- (1) This specification delineates corrective measures to be taken for circumstances not directly provided for in the system specific specifications and whose occurrence would violate the intent of the specification. For example, Specification 2.3 requires each Low Pressure Safety Injection (LPSI) pump to be operable and provides explicit corrective measures to

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2.0 LIMITING CONDITIONS FOR OPERATION

2.0.1 General Requirements (Continued)

function and have at least one normal and one emergency power source OPERABLE). If they are not satisfied, shutdown is required in accordance with this specification.

As a further example, Specification 2.7(1)b requires that both House Service Transformers T1A-3 and T1A-4 be OPERABLE. Specification 2.7(2)c provides a 72-hour out-of- service time when both required House Service Transformers T1A-3 and T1A-4 are not OPERABLE provided the operability of both Diesel Generators is immediately verified. If the definition of OPERABLE were applied without consideration of Specification 2.0.1(2), all systems, subsystems, trains, components, and devices supplied by the inoperable, House Service Transformers T1A-3 and T1A-4 would also be inoperable. This would dictate invoking the applicable measures for each of the applicable LCO's. However, the provisions of Specification 2.0.1(2) permit the time limits for continued operation to be consistent with the corrective measures for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components, and devices in both divisions must be also be OPERABLE. If these conditions are not satisfied, shutdown is required in accordance with this specification.

In Operating Modes 4 or 5, Specification 2.0.1(2) is not applicable, and thus the individual requirements for each applicable Limiting Condition for Operation in these modes must be adhered to.

- (3) *LCO 2.0.1(3) establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.*

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered.

LCO 2.0.1(3)a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 2.0.1(3)a allows 72 hours to restore the snubber(s)

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before declaring the supported system inoperable. The 72-hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 2.0.1(3)b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 2.0.1(3)b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12-hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 2.0.1(3) requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 2.0.1(3) should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

ATTACHMENT 3

Proposed Technical Specification Pages (clean)

TECHNICAL SPECIFICATIONS

2.0 LIMITING CONDITIONS FOR OPERATION

2.0.1 General Requirements

Applicability

Applies to the operable status of all systems, subsystems, trains, components, or devices covered by the Limiting Conditions for Operation.

Objective

To specify corrective measures to be employed for system conditions not covered by or in excess of the Limiting Conditions for Operation.

Specification

- (1) In the event a Limiting Condition for Operation and/or associated action requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in at least HOT SHUTDOWN within 6 hours, in at least subcritical and < 300°F within the next 6 hours, and in at least COLD SHUTDOWN within the following 30 hours, unless corrective measures are completed that permit operation under the permissible action requirements for the specified time interval as measured from initial discovery or until the reactor is placed in an Operating Mode in which the specification is not applicable. Exceptions to these requirements shall be stated in the individual specifications.
- (2) When a system, subsystem, train, component, or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in at least HOT SHUTDOWN within 6 hours, in at least subcritical and <300°F within the next 6 hours, and in at least COLD SHUTDOWN within the following 30 hours. This specification is not applicable in Operating Modes 4 or 5.
- (3) When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

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2.0 LIMITING CONDITIONS FOR OPERATION

2.0.1 General Requirements (Continued)

- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

Basis

- (1) This specification delineates corrective measures to be taken for circumstances not directly provided for in the system specific specifications and whose occurrence would violate the intent of the specification. For example, Specification 2.3 requires each Low Pressure Safety Injection (LPSI) pump to be operable and provides explicit corrective measures to be followed if one pump is inoperable. Under the terms of Specification 2.0.1(1), if more than one LPSI pump is inoperable, the unit must be placed in at least HOT SHUTDOWN within 6 hours, in at least subcritical and < 300°F within the following 6 hours, and in at least COLD SHUTDOWN within the following 30 hours, unless at least one LPSI pump were restored to operability. It is assumed that the unit is brought to the required mode within the required times by promptly initiating and carrying out the appropriate measures required by the specification.
- (2) This specification delineates what additional conditions must be satisfied to permit operation to continue, consistent with the system specific specifications for power sources, when a normal or emergency power source is not OPERABLE. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component, or device in another division is inoperable for another reason.

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2.0 LIMITING CONDITIONS FOR OPERATION

2.0.1 General Requirements (Continued)

The provisions of this specification permit the requirements associated with individual systems, subsystems, trains, components, or devices to be consistent with the specification of the associated electrical power source. It allows operation to be governed by the time limits of the requirements associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual requirements for each system, subsystem, train, component, or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Specification 2.7 requires in part that two emergency diesel generators be OPERABLE. The specification provides for 7 days per month out-of-service time when one emergency diesel generator is not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 2.0.1(2), all systems, subsystems, trains, components, and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable corrective measures for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 2.0.1(2) permit the time limits for continued operation to be consistent with the requirements for the inoperable emergency diesel generator instead, provided the other specified conditions are satisfied. In this case, this would mean that the corresponding normal power source must be OPERABLE, and all redundant systems, subsystems, trains, components, and devices must be OPERABLE, or otherwise satisfy Specification 2.0.1(2) (i.e., be capable of performing their design function and have at least one normal and one emergency power source OPERABLE). If they are not satisfied, shutdown is required in accordance with this specification.

As a further example, Specification 2.7(1)b requires that both House Service Transformers T1A-3 and T1A-4 be OPERABLE. Specification 2.7(2)c provides a 72-hour out-of-service time when both required House Service Transformers T1A-3 and T1A-4 are not OPERABLE provided the operability of both Diesel Generators is immediately verified. If the definition of OPERABLE were applied without consideration of Specification 2.0.1(2), all systems, subsystems, trains, components, and devices supplied by the inoperable, House Service Transformers T1A-3 and T1A-4 would also be inoperable. This would dictate invoking the applicable measures for each of the applicable LCO's. However, the provisions of Specification 2.0.1(2) permit the time limits for continued operation to be consistent with the corrective measures for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components, and devices in both divisions must be also be OPERABLE. If these conditions are not satisfied, shutdown is required in accordance with this specification.

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2.0 **LIMITING CONDITIONS FOR OPERATION**

2.0.1 **General Requirements** (Continued)

In Operating Modes 4 or 5, Specification 2.0.1(2) is not applicable, and thus the individual requirements for each applicable Limiting Condition for Operation in these modes must be adhered to.

- (3) LCO 2.0.1(3) establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered.

LCO 2.0.1(3)a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 2.0.1(3)a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72-hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 2.0.1(3)b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 2.0.1(3)b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12-hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

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2.0 **LIMITING CONDITIONS FOR OPERATION**

2.0.1 General Requirements (Continued)

LCO 2.0.1(3) requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 2.0.1(3) should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.