



Fort Calhoun Station
P.O. Box 550
Fort Calhoun, NE 68023

December 20, 2006
LIC-06-0146

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

- References:
1. Docket No. 50-285
 2. Letter from OPPD (R. T. Ridenoure) to NRC (Document Control Desk) dated September 8, 2004, "Fort Calhoun Station Unit No. 1 License Amendment Request, Application For Technical Specification Improvement to Eliminate Requirements For Hydrogen Monitors Using the Consolidated Line Item Improvement Process" (LIC-04-0076)
 3. Letter from NRC (A. B. Wang) to Fort Calhoun Station, Unit No. 1 (R. T. Ridenoure) dated March 22, 2005, "Fort Calhoun Station, Unit No. 1 - Issuance of Amendment Re: Elimination Of Requirements For Hydrogen Monitors Using the Consolidated Line Item Improvement Process" (FCS License Amendment 234, NRC-05-0035)

SUBJECT: Fort Calhoun Station, Unit No. 1, License Amendment Request, "Application for Technical Specification Improvement to Eliminate Requirements for Hydrogen Purge System Using the Consolidated Line Item Improvement Process"

Pursuant to 10 CFR 50.90, Omaha Public Power District (OPPD) hereby proposes to make changes to the Fort Calhoun Station (FCS) Technical Specifications (TS).

The proposed amendment will delete the TS requirements related to the hydrogen purge system in TS 2.6(3) and TS Table 3-5 Item 17. The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on September 16, 2003. The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 (68 FR 55416) as part of the consolidated line item improvement process (CLIIP). The elimination of the hydrogen purge system requirements, although not specifically addressed in the CLIIP, is discussed and approved in the Federal Register notices approving the CLIIP (68 FR 54132 & 68 FR 55417).

OPPD submitted a license amendment request to eliminate requirements for hydrogen monitors using the TSTF-447 CLIIP (Reference 2). Since FCS utilizes hydrogen purge rather than hydrogen

recombiners, as in standard technical specifications, only changes for the hydrogen monitors were requested at that time, in order to expedite approval. That request was approved by the NRC on March 22, 2005 (Reference 3). This submittal addresses the hydrogen purge portion of TSTF-447.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications and commitments. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides revised, clean TS pages. Implementation of TSTF-447 also involves various changes to the TS Bases. The TS Bases changes will be submitted with a future update in accordance with TS 5.20, "Technical Specifications (TS) Bases Control Program."

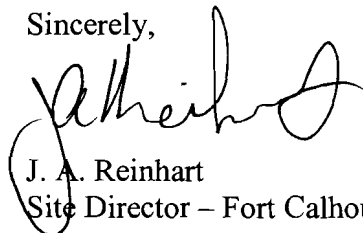
OPPD requests approval of the proposed amendment by June 30, 2007. OPPD requests 120 days to implement this amendment. No new regulatory commitments are made in this letter.

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

I declare under penalty of perjury that the foregoing is true and correct. (Executed on December 20, 2006)

If you have any questions or require additional information, please contact Thomas C. Matthews at (402) 533-6938.

Sincerely,



J. A. Reinhart
Site Director – Fort Calhoun Station

JAR/RRL/trl

Attachments:

1. Omaha Public Power District Evaluation
 2. Markup of Technical Specification Pages
 3. Proposed Technical Specifications (clean)
- c: Director of Consumer Health Services, Department of Regulation and Licensure, Nebraska Health and Human Services, State of Nebraska

ATTACHMENT 1

Omaha Public Power District Evaluation for Amendment of Operating License

- 1.0 INTRODUCTION
- 2.0 DESCRIPTION OF PROPOSED AMENDMENT
- 3.0 BACKGROUND
- 4.0 REGULATORY REQUIREMENTS & GUIDANCE
- 5.0 TECHNICAL ANALYSIS
- 6.0 REGULATORY ANALYSIS
- 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)
- 8.0 ENVIRONMENTAL EVALUATION
- 9.0 PRECEDENCE
- 10.0 REFERENCES

Omaha Public Power District Evaluation For Amendment of Operating License

1.0 INTRODUCTION

The proposed amendment will delete the TS requirements related to the hydrogen purge system in TS 2.6(3) and TS Table 3-5 Item 17. The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on September 16, 2003 (68 FR 54123).

The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 (68 FR 55416) as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-447, the proposed TS changes include:

- TS 2.6(3) – Deleted
- TS Table 3-5 Item 17 – Deleted

The associated TS Bases changes (as indicated below) will be submitted with a future update in accordance with TS 5.20, "Technical Specifications (TS) Bases Control Program."

- TS Bases section 2.6, 3rd and 4th paragraphs (as indicated in the markup) – Deleted
- TS Bases section 3.2, 6th paragraph (as indicated in the markup) – Deleted

The Omaha Public Power District (OPPD) previously amended the TS requirements related to the hydrogen monitor system as described in the NRC-approved Revision 1 of TSTF-447. These changes are documented in Reference 10.2 and 10.3.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416, Reference 10.1), TSTF-

447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents. The elimination of the hydrogen purge system requirements, although not specifically addressed in the CLIIP, are discussed and approved in the Federal Register notices approving the CLIIP (68 FR 54132 & 68 FR 55417).

OPPD submitted a license amendment request to eliminate requirements for hydrogen monitors using the TSTF-447 CLIIP to the NRC (Reference 10.2). Since FCS utilizes hydrogen purge rather than hydrogen recombiners, as in standard technical specifications, only changes for the hydrogen monitors were requested, in order to expedite approval. That request was approved by the NRC on March 22, 2005 (Reference 10.3). This submittal addresses the hydrogen purge portion of TSFT-447.

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 September 25, 2003 (68 FR 55416, Reference 10.1), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

5.0 TECHNICAL ANALYSIS

OPPD has reviewed the safety evaluation (SE) published on September 25, 2003 (68 FR 55416) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE, as well as the supporting information provided to support TSTF-447. OPPD has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to FCS and justify this amendment for the incorporation of the changes to the FCS TS.

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 September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

6.1 Verification and Commitments

OPPD has previously made the verifications and regulatory commitments, as requested in the model SE published in the Federal Register on September 25, 2003 (68 FR 55416), for this TS improvement. These verifications and regulatory commitments, repeated below, are documented in Reference 10.2 and 10.3:

1. OPPD has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at FCS and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be

maintained as non-safety-related equipment and they shall be included in the Updated Safety Analysis Report (USAR).

2. FCS does not have an inerted containment.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

OPPD has reviewed the proposed no significant hazards consideration determination published on September 25, 2003 (68 FR 55416, Reference 10.1) 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 September 25, 2003 (68 FR 55416, Reference 10.1) 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 PRECEDENCE

This application is being made in accordance with the CLIIP. OPPD is not proposing variations or deviations from the TS changes described in TSTF-447 or the NRC staff's model SE published on September 25, 2003 (68 FR 55416, Reference 10.1). As noted therein, the model SE was changed, during the public review process (68 FR 54123), to address the acceptability of "eliminating containment purging as the design basis method for post-LOCA hydrogen control" (68 FR 54132 & 68 FR 55417).

10.0 REFERENCES

- 10.1. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement to Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process, published September 25, 2003, (68 FR 55416).
- 10.2. Letter from OPPD (R. T. Ridenoure) to NRC (Document Control Desk) dated September 8, 2004, "Fort Calhoun Station Unit No. 1 License Amendment Request, Application For Technical Specification Improvement to Eliminate Requirements For Hydrogen Monitors Using the Consolidated Line Item Improvement Process" (LIC-04-0076)
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the Consolidated Line Item Improvement Process” (FCS License Amendment 234, NRC-05-0035)

- 10.4. Federal Register Notice: Biweekly Notice; Applications and Amendments to Facility Operating Licenses Involving No Significant Hazards Considerations, published January 18, 2005, (70 FR 2886).

ATTACHMENT 2

Markup of Technical Specification Pages

TECHNICAL SPECIFICATIONS

2.0 **LIMITING CONDITIONS FOR OPERATION**

2.6 Containment System (Continued)

c. DELETED

d. ~~DELETED The containment isolation valves VA-280 and VA-289 shall be locked closed. Opening of these valves intermittently under administrative control is not allowed.~~

e. The containment purge isolation valves will be locked closed unless the reactor is in a cold or refueling shutdown condition.

(2) Internal Pressure

The internal pressure shall not exceed 3 psig (except for containment leak rate tests).

~~(3) Hydrogen Purge System~~

~~a. Minimum Requirements~~

~~The reactor shall not be made critical unless all of the following requirements are met:~~

~~1. The containment isolation valves VA-280 and VA-289 shall be locked closed. Opening of these valves intermittently under administrative control is not allowed.~~

~~2. VA-80A and VA-80B with associated valves and piping to include VA-82 filters, are operable.~~

~~b. Modification of Minimum Requirements~~

~~After the reactor has been made critical, the minimum requirements may be modified to allow either or both of the following statements (i,ii) to be applicable at any one time. If the operability of the component(s) is not restored to meet the minimum requirements within the time specified below, the reactor shall be placed in a hot shutdown condition within six hours.~~

~~(i) One of the hydrogen purge fans, VA-80A or VA-80B, with associated valves and piping, may be inoperable provided the fan is restored to operable status within 30 days.~~

~~(ii) The hydrogen purge filter system, VA-82, may be inoperable provided the system is restored to operable status within 72 hours.~~

TECHNICAL SPECIFICATIONS

TABLE 3-5
MINIMUM FREQUENCIES FOR EQUIPMENT TESTS

	<u>Test</u>	<u>Frequency</u>
17.	Hydrogen Purge System DELETED	
	1. Verify all manual valves are operable by completing at least one cycle.	R
	2. Cycle each automatic valve through at least one complete cycle of full travel from the control room. Verification of the valve cycling may be determined by the observation of position indicating lights.	R
	3. Initiate flow through the VA-80A and VA-80B blowers, HEPA filter, and charcoal adsorbers and verify that the system operates for at least	
	(a) 30 minutes with suction from the auxiliary building (Room 59)	a) M
	(b) 10 hours with suction from the containment	b) R
	4. Verify the pressure drop across the VA-82 HEPAs and charcoal filter to be less than 6 inches of water. Verify a system flow rate of greater than 80 scfm and less than 230 scfm during system operation when tested in accordance with 3b. above.	R
18.	Shutdown Cooling	
	1. Verify required shutdown cooling loops are OPERABLE and one shutdown cooling loop is IN OPERATION.	S (when shutdown cooling is required by TS 2.8).
	2. Verify correct breaker alignment and indicated power is available to the required shutdown cooling pump that is not IN OPERATION.	W (when shutdown cooling is required by TS 2.8).

ATTACHMENT 3

Proposed Technical Specification Pages (clean)

TECHNICAL SPECIFICATIONS

2.0 LIMITING CONDITIONS FOR OPERATION

2.6 Containment System (Continued)

- c. DELETED
- d. The containment isolation valves VA-280 and VA-289 shall be locked closed. Opening of these valves intermittently under administrative control is not allowed.
- e. The containment purge isolation valves will be locked closed unless the reactor is in a cold or refueling shutdown condition.

(2) Internal Pressure

The internal pressure shall not exceed 3 psig (except for containment leak rate tests).

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