Omaha Public Power District
1946 - 2006
Fort Calhoun Station
P.O. Box 550
Fort Calhoun, NE 68023

April 4, 2008
LIC-08-0040

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

References:
1. Docket No. 50-285
2. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "Fort Calhoun Station, Unit No.1 License Amendment Request (LAR) "Modification of Surveillance Requirements for Emergency Mode (Remotely Operated) Dampers in Containment Air Cooling and Filtering System," dated October 19, 2007 (LIC-07-0092)
3. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "Revision to Technical Evaluation of Fort Calhoun Station, Unit No. 1 License Amendment Request (LAR) "Modification of Surveillance Requirements for Emergency Mode (Remotely Operated) Dampers in Containment Air Cooling and Filtering System," dated December 12, 2007 (LIC-07-0104) (ML03461006)
4. Email from NRC (M. T. Markley) to OPPD (T. C. Matthews), "Request for Additional Information," dated March 27, 2008 (ML0808800092)

SUBJECT: Fort Calhoun Station Response to Request for Additional Information License Amendment Request Re: Dampers in Containment Air Cooling (MD7043)

The Omaha Public Power District's (OPPD) response to Questions 4 and 5 of Reference 4 is attached. In a teleconference held on April 1, 2008, the NRC indicated that these two questions could be answered separately as they are related to approval of Reference 2 as supplemented by Reference 3.

As discussed during the teleconference and noted in the response to Question 5, OPPD is making a regulatory commitment to revise the Basis of Technical Specification (TS) 3.6 in accordance with TS 5.20, "Technical Specification Basis Control Program," to clarify that that the emergency mode dampers are separate and distinct from the fusible link automatic dampers. The Basis change will be implemented along with the approved amendment, prior to startup from the 2008 refueling outage.

Please note that following NRC approval of Reference 2 and installation of the associated modification, position indication of the emergency mode dampers will still be provided in the control room but will no longer serve a safety related purpose. Therefore, OPPD proposes to delete its Regulatory Guide 1.97 commitment to monitor the position of these dampers.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 4, 2008.

R. P. Clemens
Division Manager – Nuclear Engineering

RPC/mle

Attachment: Fort Calhoun Station Response to Request for Additional Information
License Amendment Request Re: Dampers in Containment Air Cooling
(MD7043)

OMAHA PUBLIC POWER DISTRICT (OPPD)

FORT CALHOUN STATION (FCS), UNIT NO. 1

DOCKET NO. 50-285

FORT CALHOUN STATION
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST RE:
DAMPERS IN CONTAINMENT AIR COOLING (MD7043)

FORT CALHOUN STATION
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST RE: DAMPERS IN CONTAINMENT AIR COOLING
(MD7043)

4. **Are the containment air-cooling and filter system (CACFS) and the associated air filters safety-related?**

   Yes. The containment air cooling and filtering System (CACFS) is a safety-related, Class 1 seismic system. As discussed in a teleconference held on April 1, 2008, the high efficiency particulate air (HEPA) filters were verified to be a critical quality element (CQE) component, which makes them safety-related. A submittal (Reference 1) unrelated to References 2 and 3 erroneously stated that the HEPA filters are not CQE.

5. **Technical Specification 3.6(3)(a) indicates that the emergency mode dampers will be verified to be in their accident position and the fusible link damper operation will be checked for operability. If the emergency mode dampers are being fixed in the accident configuration please discuss how the fusible link affects the damper position.**

   The fusible link dampers are a separate set of dampers from the emergency mode dampers. The fusible link dampers are located at the bottom of the plenum and direct the discharge downwards. The fusible link dampers are held closed against gasketed flanges by chains with fusible links. On an increase in temperature, the fusible links part and counter balances open the dampers. Assuming the ductwork fails during the design basis accident, air discharged from the fans will be directed through the fusible link dampers, reinforcing the tendency of the cooled mixture to go to the bottom of the containment building.

   Thus, there is no direct relationship between the fusible link dampers and the emergency mode dampers. Placing the emergency mode dampers into their accident position causes the CACFS to operate in filtered air mode only. The requirement to verify operability of fusible link automatic damper operation is historical and References 3 and 4 did not propose a change to that requirement. The emergency mode dampers operate using a solenoid valve that supplies control air pressure to a piston operator. The modification will permanently remove control air to the piston operators causing the valve springs to set the emergency mode dampers into their post-accident filtration position.

   As noted on Page 13 of Attachment 1 of Reference 3, the limit switches will still notify control room operators, via the qualified safety parameter display system (QSPDS), and the emergency response facilities (ERF) plant computer if the dampers are not in their accident position.

Since the signal is still active, it was considered a good practice to maintain the surveillance requirement to verify the position of the emergency mode dampers each outage. Emergency mode damper position indication will still be provided in the control room. However, since the emergency mode dampers cannot change state, the display will be considered for information only. As emergency mode damper position indication will no longer serve a safety related purpose following the modification, OPPD proposes to delete a Regulatory Guide 1.97 commitment to monitor the position of these dampers.

As discussed during a teleconference held on April 1, 2008, the Omaha Public Power District (OPPD) is committing to revise the Basis of Technical Specification (TS) 3.6 in accordance with TS 5.20, "Technical Specification Basis Control Program," to clarify that that the emergency mode dampers are separate from the fusible link automatic dampers. The Basis change will be implemented along with the approved amendment prior to startup from the 2008 refueling outage.

References

1. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk), "Submittal of Revision 1 to Engineering Analysis Supporting Compensatory Measures Implemented as a Result of GSI-191," dated February 17, 2006 (LIC-06-0014)
2. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "Fort Calhoun Station, Unit No.1 License Amendment Request (LAR) "Modification of Surveillance Requirements for Emergency Mode (Remotely Operated) Dampers in Containment Air Cooling and Filtering System," dated October 19, 2007 (LIC-07-0092)
3. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk), "Revision to Technical Evaluation of Fort Calhoun Station, Unit No. 1 License Amendment Request (LAR) "Modification of Surveillance Requirements for Emergency Mode (Remotely Operated) Dampers in Containment Air Cooling and Filtering System," dated December 12, 2007 (LIC-07-0104)) (ML03461006)