

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

January 7, 2011

Mr. David J. Bannister Vice President and CNO Omaha Public Power District Fort Calhoun Station 444 South 16th St. Mall Omaha, NE 68102-2247

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 - REQUEST FOR ADDITIONAL INFORMATION RE: LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION (TS) 2.15, TABLE 2-5, ITEM 1 AND TS 3.1, TABLE 3-3, ITEMS 1, 2, AND 4, CONTROL ELEMENT ASSEMBLY POSITION INDICATION AND CORRECTION OF TS 2.10.2(7)c (TAC NO. ME4230)

Dear Mr. Bannister:

By letter dated July 12, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML101930443), Omaha Public Power District (OPPD or the licensee) requested the U.S. Nuclear Regulatory Commission (NRC) approve a license amendment request for the Fort Calhoun Station, Unit 1. The proposed changes would revise Technical Specification (TS) Table 2-5, Item 1 of TS 2.15 and Table 3-3, Items 1, 2, and 4 of TS 3.1, which pertain to operability of the primary and secondary control element assembly (CEA) position indication system channels. A new surveillance requirement is also proposed for TS 3.1 to verify the position of the CEAs during each shift. The proposed amendment would also revise TS 2.10.2(7)c regarding actions to be taken when the regulating CEA groups are inserted below the Long Term Insertion Limit. The TS would be revised to require actions to be taken when either time interval is exceeded, which would also make TS 2.10.2(7)c more consistent with Combustion Engineering (CE) Standard Technical Specifications (STS).

The NRC staff has reviewed the information provided in the submittal and determined that additional information is required in order to complete the review and approval of the changes. The request for additional information (RAI) was discussed with Bill Hansher and others of your staff on December 15, 2010. Mr. Hansher indicated that the response would be provided within 30 days of receipt of this letter. The RAI is enclosed.

D. Bannister

If you have any questions, please contact me at 301-415-1377 or via e-mail at <u>lynnea.wilkins@nrc.gov</u>.

Sincerely,

Lynnea Wilkins, Project Manager Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Enclosure: Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO REVISE

TECHNICAL SPECIFICATION (TS) 2.15, TABLE 2-5, ITEM 1 AND

TS 3.1, TABLE 3-3, ITEMS 1, 2, AND 4, CONTROL ELEMENT

ASSEMBLY POSITION INDICATION AND CORRECTION OF TS 2.10.2(7)c

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

By letter dated July 12, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML101930443), Omaha Public Power District (OPPD or the licensee) requested the U.S. Nuclear Regulatory Commission (NRC) approve a license amendment request for the Fort Calhoun Station, Unit 1 (FCS). The proposed changes would revise Technical Specification (TS) Table 2-5, Item 1 of TS 2.15 and Table 3-3, Items 1, 2, and 4 of TS 3.1, which pertain to operability of the primary and secondary control element assembly (CEA) position indication system (CEAPIS) channels. A new surveillance requirement is also proposed for TS 3.1 to verify the position of the CEAs during each shift. The proposed amendment would also revise TS 2.10.2(7)c regarding actions to be taken when the regulating CEA groups are inserted below the Long Term Insertion Limit. The TS would be revised to require actions to be taken when either time interval is exceeded, which would also make TS 2.10.2(7)c more consistent with Combustion Engineering (CE) Standard Technical Specifications (STS).

The NRC staff has reviewed and evaluated the information provided by the licensee and has determined that the following information is needed in order to complete its review.

Appendix G of the FCS Updated Safety Analysis Report (USAR) contains the FCS Design Criteria. Criterion 13, "Fission Process Monitors and Controls," of the plant specific design criteria states:

Means shall be provided for monitoring and maintaining control over the fission process throughout core life and for all conditions that can reasonably be anticipated to cause variations in reactivity of the core, such as indication of position of control rods and concentration of soluble reactivity control poisons.

The licensee states in Appendix G of its USAR that FCS takes credit for having "two independent rod position indicating systems" as one of the means for monitoring control over the fission process – specifically providing indication of position of control rods.

Given that the FCS USAR identifies having "two independent rod position indicating systems:"

- 1. Please state if the CEA full-in and full-out indications are independent from the primary CEAPIS. If the full-in and full-out indications are not independent from the primary CEAPIS, please clarify if FCS would consider the CEA full-in and full-out indications appropriate for use in performing CHANNEL CHECKS of the primary CEAPIS if the secondary CEAPIS was inoperable. If these indications are not independent from the primary system, but are still intended for use in channel checking the primary system, please justify their use in this manner with regard to commitments made to implement FCS Design Criterion 13.
- 2. Please state if the CEA full-in and full-out indications are independent from the secondary CEAPIS. If the full-in and full-out indications are not independent from the secondary CEAPIS, please clarify if FCS would consider the CEA full-in and full-out indications appropriate for use in performing CHANNEL CHECKS of the secondary CEAPIS if the primary CEAPIS was inoperable. If these indications are not independent from the secondary system, but are still intended for use in channel checking the secondary system, please justify their use in this manner with regard to commitments made to implement FCS Criterion 13.

D. Bannister

If you have any questions, please contact me at 301-415-1377 or via e-mail at <u>lynnea.wilkins@nrc.gov</u>.

Sincerely,

/RA/

Lynnea Wilkins, Project Manager Plant Licensing Branch IV Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Enclosure: Request for Additional Information

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*letter dated