

## REQUEST FOR ADDITIONAL INFORMATION

By letter dated August 16, 2010, as supplemented by letter dated September 27, 2010, (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML102290067 and ML102720964), Omaha Public Power District (OPPD, the licensee) proposed changes to the Technical Specifications (TS) for Fort Calhoun Station Unit 1 (FCS). The proposed changes would relocate operating and surveillance requirements (SR) for the power operated relief valve (PORV) position, safety valve position (PSV) and tailpipe temperature instrumentation from FCS TS to FCS Updated Safety Analysis Report (USAR). Specifically the proposed changes would revise:

- TS Table 2-5, "Instrumentation Operating Requirements for Other Safety Feature Functions"
- TS Table 3-3, "Minimum Frequencies for Checks, Calibrations and Testing of Miscellaneous Instrumentation and Controls"

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 of the relief request.

1. By letter dated August 16, 2010, the licensee states, "The loss of this instrumentation has no effect on the probabilistic risk assessment [PRA] and has not been shown to be significant to public health and safety (Criterion 4)."

Please provide details on how this statement was concluded. Specifically, discuss any operating experience involving the failure of this equipment at the plant (or similar experience within the industry) and how this experience is determined to be insignificant. Also, describe the impact of the failure of this equipment on the base PRA results, including the risk achievement worth (RAW) and risk reduction worth (RRW) [or Fussell-Vesely (FV) importance] for this equipment (or surrogate PRA component if this equipment is not modeled directly in the PRA), and how these impacts are determined to be insignificant.

2. In letter dated July 12, 2010, (ADAMS Accession Numbers ML101930443), OPPD submitted a license amendment request (LAR) to add Note e to TS LCO 2.15, Table 2-5, Item 1. The July 12, 2010 LAR is under separate review by the NRC staff. In letter dated August 16, 2010, OPPD submitted a LAR which requests deletion of TS 2.15, Table 2-5 Notes a through d. The August 16, 2010 LAR also requests re-lettering TS 2.15, Table 2-5 Note e to Note a upon subsequent NRC approval of both LARs. Since the re-lettering of TS 2.15, Table 2-5 Note e to Note a was not reflected on TS 2.15, Table 2-5 in Enclosure Attachment 1, "Technical Specifications Pages Markup," the NRC staff is concerned that the reference to Note e in TS 2.15, Table 2-5 item 1 will not be re-lettered when TS 2.15, Table 2-5 Note e is re-lettered to Note a.

ENCLOSURE

Please provide an integrated TS markup that will show all the changes proposed by the July 12, 2010 and August 16, 2010 LARs and include the clean TS pages.

3. In letters dated May 31, 2010 and June 1, 2010, (ADAMS Accession Numbers ML101520198 and ML101530319) OPPD requested an emergency amendment to modify TS 2.15, Table 2-5 Note c to allow a onetime extension of the 7-day allowed outage time for the inoperability of Function 4 regarding safety valve acoustic position indication for RC-142 to allow repair prior to the next entry into Operating Mode 3 (Hot Shutdown) from Operating Mode 4 (Cold Shutdown). The onetime extension was applied through footnote 'i' associated with Note c. This change allowed FCS to continue power operations with inoperable safety valve acoustic position indication on safety valve RC-142. The NRC staff approved the license amendment request on July 12, 2010 in TS amendment number 265 (ADAMS Accession Numbers ML101520296). In your LAR dated August 16, 2010 you propose to delete footnote 'i' associated with Note c. However, it is unclear if FCS has used the onetime extension of the 7-day allowed outage time for the inoperability of safety valve acoustic position indication for RC-142 and if RC-142 was repaired prior to the next entry into Operating Mode 3 (Hot Shutdown) from Operating Mode 4 (Cold Shutdown).

Since July 12, 2010, has FCS either used the onetime extension of the 7-day allowed outage time for the inoperability of safety valve acoustic position indication for RC-142, or determined that it was no longer needed.