your energy partner
OPPD
Omaha Public Power District
444 South 16th Street Mall
Omaha, NE 68102-2247

LIC-12-0116
August 3, 2012

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

Reference: Docket No. 50-285

Subject: Licensee Event Report 2012-010, Revision 0, for the Fort Calhoun Station

Please find attached Licensee Event Report 2012-010, Revision 0, dated August 3, 2012. This report is being submitted pursuant to 10 CFR 50.73(a)(2)(ii)(B).

No commitments are being made in this letter.

If you should have any questions, please contact me.

Sincerely,

D. J. Bannister
Vice President and CNO

DJB /sds

Attachment
c: E. E. Collins, Jr., NRC Regional Administrator, Region IV
L. E. Wilkins, NRC Project Manager
J. C. Kirkland, NRC Senior Resident Inspector
INPO Records Center

NRC FORM 366 (10-2010) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2013

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Fort Calhoun Station	05000285	1 OF 3

4. TITLE

Seismic Qualification of Instrument Racks

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
										05000
12	6	2011	2012	- 010 -	0	8	3	2012	FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE

5

10. POWER LEVEL

0

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check all that apply)*

- ☐ 20.2201(b)
- ☐ 20.2201(d)
- ☐ 20.2203(a)(1)
- ☐ 20.2203(a)(2)(i)
- ☐ 20.2203(a)(2)(ii)
- ☐ 20.2203(a)(2)(iii)
- ☐ 20.2203(a)(2)(iv)
- ☐ 20.2203(a)(2)(v)
- ☐ 20.2203(a)(2)(vi)
- ☐ 20.2203(a)(3)(i)
- ☐ 20.2203(a)(3)(ii)
- ☐ 20.2203(a)(4)
- ☐ 50.36(c)(1)(i)(A)
- ☐ 50.36(c)(1)(ii)(A)
- ☐ 50.36(c)(2)
- ☐ 50.46(a)(3)(ii)
- ☐ 50.73(a)(2)(i)(A)
- ☐ 50.73(a)(2)(i)(B)
- ☐ 50.73(a)(2)(i)(C)
- ☐ 50.73(a)(2)(ii)(A)
- ☒ 50.73(a)(2)(ii)(B)
- ☐ 50.73(a)(2)(iii)
- ☐ 50.73(a)(2)(iv)(A)
- ☐ 50.73(a)(2)(v)(A)
- ☐ 50.73(a)(2)(v)(B)
- ☐ 50.73(a)(2)(v)(C)
- ☐ 50.73(a)(2)(v)(D)
- ☐ 50.73(a)(2)(vii)
- ☐ 50.73(a)(2)(viii)(A)
- ☐ 50.73(a)(2)(viii)(B)
- ☐ 50.73(a)(2)(ix)(A)
- ☐ 50.73(a)(2)(x)
- ☐ 73.71(a)(4)
- ☐ 73.71(a)(5)
- ☐ OTHER

Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME	TELEPHONE NUMBER *(Include Area Code)*
Erick Matzke	402-533-6855

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

☒ YES *(If yes, complete 15. EXPECTED SUBMISSION DATE)* ☐ NO

15. EXPECTED SUBMISSION DATE

MONTH	DAY	YEAR
10	30	2012

ABSTRACT *(Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)*

While preparing an engineering package to relocate two transmitters, Fort Calhoun Station engineering identified seismic class 1 components in a seismic class 2 instrument rack. This appears to be a legacy issue. The instrument racks in the auxiliary building and containment were assessed with respect to the Updated Safety Analysis Report (USAR) specified class 1 requirements for seismic design. The seismic calculations for two instrument racks were over the analyzed weight for the seismic analysis. The instruments on these racks are used for reactor coolant system (RCS) pressure transmitters. During a seismic event, the excessive weight of these instrument racks could cause the racks to fail, resulting in an unisolable leak from the RCS.

A cause analysis is in progress. The results of the analysis will be published in a supplement to this LER.

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NARRATIVE

BACKGROUND

Fort Calhoun Station (FCS) is a two-loop reactor coolant system of Combustion Engineering (CE) design.

EVENT DESCRIPTION

While preparing an engineering package to relocate two transmitters, Fort Calhoun Station engineering identified seismic class 1 components in a seismic class 2 instrument rack. This appears to be a legacy issue. The instrument racks in the auxiliary building and containment were assessed with respect to the Updated Safety Analysis Report (USAR) specified class 1 requirements for seismic design. The seismic calculations for two instrument racks were over the analyzed weight for the seismic analysis. The instruments on these racks are used for reactor coolant system (RCS) pressure transmitters. During a seismic event, the excessive weight of these instrument racks could cause the racks to fail, resulting in an unisolable leak from the RCS.

At 2059 Central Daylight Time (CDT) on June 4, 2012, an 8-hour notification was made to the Headquarters Operations office (HOO), under 10CFR50.72(b)(3)(ii)(A), degraded condition. Subsequent internal review has determined that the initial reporting criterion for degraded condition, 10 CFR 50.72(b)(3)(ii)(A), was incorrect. The 8-hour non-emergency notification should have been made under 10 CFR 50.72(b)(3)(ii)(B), unanalyzed condition. On August 3, 2012, Event Notification (EN) 47992 was updated to correct the reporting criterion. This report is being submitted in accordance with 10 CFR 50.73(a)(2)(ii)(B).

This LER reports a condition where components classified as seismic class 1 were installed in instrument racks classified as seismic class 2, specifically RCS pressure transmitters that are part of the RCS pressure boundary. A failure of these racks during a seismic event could result in an unisolable RCS leak. The condition was documented in the FCS corrective action system on December 6, 2011. The initial Operations review focused on the current operating conditions, noting that the condition would need to be resolved prior to start up. The station paradigm inappropriately concluded that reportability could be evaluated at a later date since current operating conditions were not challenged, and that the 60-day reporting window commenced when the event was determined to be reportable. This condition was initially reported in Event Notification (EN) 47992 on June 4, 2012, at 2059 CDT. FCS has been systematically addressing issues that have been identified since June 2011, in response to the flooding conditions, switchgear fire, and increased oversight. This LER is being submitted beyond the 60-day regulatory reporting requirement due to non-conservative decisions with respect to procedural and regulatory reportability requirements and resource constraints caused by the operating challenges which began in June 2011.

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NARRATIVE

CONCLUSION

A cause analysis is in progress. The results of the analysis will be published in a supplement to this LER.

CORRECTIVE ACTIONS

A cause analysis is in progress. The corrective actions will be published in a supplement to this LER.

SAFETY SIGNIFICANCE

A cause analysis is in progress. The results of the analysis will be published in a supplement to this LER.

SAFETY SYSTEM FUNCTIONAL FAILURE

This event does not result in a safety system functional failure in accordance with NEI-99-02.

PREVIOUS EVENTS

A cause analysis is in progress. Previous Events will be determined from the results of the cause analysis.