

Burkhardt, Janet

From: Wilkins, Lynnea
Sent: Thursday, August 22, 2013 2:21 PM
To: 'HANSHER, BILL R'
Cc: 'EDWARDS, MICHAEL L'; Burkhardt, Janet; Sebrosky, Joseph
Subject: Fort Calhoun RAI Re: Revisions to TS 2.01 and 2.7 (MF0691)

Bill,

By letter dated February 18, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13051A741), the Omaha Public Power District (the licensee) requested an amendment to Facility Operating License No. DPR-40 for Fort Calhoun Station (FCS), Unit 1. The proposed changes would revise the FCS Technical Specification (TS) as follows: (1) revise the definition for Operable-Operability, (2) modify the provisions under which equipment may be considered operable when either its normal or emergency power source is inoperable, and (3) revise the minimum requirement statement in TS 2.7 in previously approved Amendment 147.

The NRC staff has reviewed the information provided and has determined that additional information specified in the Request for Additional Information (RAI) below is needed for the staff to complete its evaluation.

A draft version of the RAIs were transmitted by email on July 30, 2013 (ADAMS Accession No. ML13212A009). By email dated August 20, 2012 you stated that a response would be provided by September 19, 2012.

If circumstances result in the need to revise the requested response date, please contact me or Joe Sebrosky.

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Cooper Nuclear Station
Plant Licensing Branch IV
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REQUEST FOR ADDITIONAL INFORMATION
OMAHA PUBLIC POWER DISTRICT
FORT CALHOUN STATION, UNIT 1
DOCKET NO. 50-285

RAI 1

The proposed TS LCO 2.0.1(2) states:

“When the reactor coolant temperature is > 300°F and a system, subsystem, train, component, or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE, or likewise satisfy the requirements of this specification.”

- a. "Within 4 hours from discovery of either diesel generator inoperability, declare the required feature(s) associated with the inoperable diesel generator inoperable, when its redundant required feature (including the steam driven auxiliary feedwater pump FW-10) is inoperable."
- b. "Within 24 hours from discovery of either house service transformer inoperability, declare the required feature(s) associated with the inoperable house service transformer inoperable, when its redundant required feature (including the steam driven auxiliary feedwater pump FW-10) is inoperable."

The wording of the above proposed TS LCO 2.0.1(2) appears similar to NUREG-0212, Revision 2, LCO 3.0.5. However, the proposed TS wording does not include the 2-hour verification of (1) and (2) above is satisfied and it does not include the required action and completion times to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply as identified in the NUREG. Please explain this inconsistency with NUREG-0212 and explain why continued safe operation is assured without timely (within 2-hours) verification and actions consistent with those identified in NUREG-0212.

RAI 2

The proposed relocation of "a" and "b" from TS 2.7, Electrical Systems, to TS LCO 2.0.1 is inconsistent with NUREG-0212 and NUREG-1432. Please explain how these changes more align Ft Calhoun TS with NUREG-0212 Revision 2, "*Standard Technical Specifications [STS] for Combustion Engineering Plants*," as stated in the application.

RAI 3

TS 2.0 Limiting Conditions for Operation, 2.0.1 General Requirements, Applicability states:

"Applies to the operable status of all systems, subsystems, trains, components, or devices covered by the Limiting Conditions for Operation."

Please identify all affected LCOs and the provide the reason(s) and safety justification for the proposed TS LCO 2.0.1(2) relaxation of the electrical power LCO Operability requirements for a system, subsystem, train, component or device when reactor coolant (RC) temperature is greater than 300 degrees F as compared to when the RC temperature is less than 300 degrees F (e.g., LCO 2.2, Chemical and Volume Control System Charging Pumps, Boric Acid Pumps, etc.)

RAI 4

In the LAR dated February 18, 2013, the licensee provided proposed changes to the TS 2.7 minimum requirements for the Limiting Condition of Operation (LCO) for Electrical Systems for the condition when reactor coolant temperature will be > 300° F (applicable to the availability of electrical systems for the operation of plant components). However, the staff did not find the minimum requirements for the LCOs and Surveillance Requirements (SRs) for electrical systems when reactor coolant temperature will be < 300° F. NUREG-0212 also contains minimum requirements for LCOs during shutdown condition for electrical equipment in TS 3.8.1.2, 3.8.2.2, 3.8.2.4 and related surveillance requirements (SRs) in TS 4.8.1.2, 4.8.2.2, 4.8.2.4.1 and 4.8.2.4.2 Please provide justification for deviation from NUREG-0212 for not including above LCOs and SRs for shutdown conditions when reactor coolant temperature < 300° F. Please provide an overview of all electrical equipment required to be operable for reactor coolant temperature < 300° F.

RAI 5

The proposed TS LCO 2.0.1, Specification (2) in the LAR dated February 18, 2013, states, in part "its corresponding normal or emergency power sources is OPERABLE". This statement does not appear to be

consistent with the proposed change in definition of “Operable – Operability” which reflects “normal and emergency electrical power sources.

- 1) Please explain the discrepancy between the proposed changes.
- 2) License Amendment No. 264 approved changes to definitions of “Operable-Operability and as a consequence, inadvertently changed the requirement for an operable emergency power source, when reactor coolant temperature is < 300° F. Please provide details on operability requirements of equipment that will be impacted if the proposed change to TS LCO 2.0.1, Specification (2) in the LAR with the requirement for normal or emergency power is approved.

RAI 6

Attachment 2 in Enclosure (TS Pages Retyped (“Clean”) Definitions ‘Operable – Operability’) of the LAR dated February 18, 2013, states, “Implicit in this definition shall be the assumption that all necessary....” does not appear to be consistent with NUREG-0212 Definition of “Operable – Operability.” The NUREG-0212 Definition of “Operable – Operability” does not include the underlined words as stated above. Please explain the reasons for adding additional words “Implicit in this definition shall be the assumption that” to the NUREG 02012 Definition of “Operable – Operability” in the proposed TS change.”