



10 CFR 50.90

LIC-14-0131
November 21, 2014

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

Fort Calhoun Station, Unit No. 1
Renewed Facility Operating License No. DPR-40
NRC Docket No. 50-285

- References:
1. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), *License Amendment Request (LAR) 14-10; One-Time Extension of Technical Specification Surveillance Requirements*, dated November 7, 2014 (LIC-14-0128) (ML14311A158)
 2. Email from NRC (C. F. Lyon) to OPPD (B. Hansher), *RAIs for Urgent LAR for Fort Calhoun SRs that expire before the Spring RFO (TAC No. MF5143)*, dated November 18, 2014 (ML14322A926)

SUBJECT: Response to NRC Request for Additional Information Regarding License Amendment Request (LAR) 14-10; One-Time Extension of Technical Specification Surveillance Requirements

In Reference 1, the Omaha Public Power District (OPPDP) requested an amendment to Renewed Facility Operating License No. DPR-40 for Fort Calhoun Station (FCS), Unit No. 1. Specifically, OPPD proposed to revise a limited number of Technical Specification (TS) Surveillance Requirements (SRs) by adding a note or footnote permitting a one-time extension from a refueling frequency (i.e., at least once per 18 months) to a maximum of 28 months.

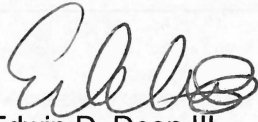
On November 18, 2014, OPPD received a request for additional information (Reference 2) from the NRC, which contained a comment and two (2) questions. On November 19, 2014, the NRC Project Manager clarified that a response to the comment was not required. Accordingly, OPPD's response to the two (2) NRC questions is attached.

No regulatory commitments are contained in this submittal.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated State of Nebraska official.

If you should have any questions regarding this submittal or require additional information, please contact Mr. Bill R. Hansher at (402) 533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
November 21, 2014



Edwin D. Dean III
Plant Manager

EDD/mle

Attachment: OPPD Response to NRC Request for Additional Information

- c: M. L. Dapas, NRC Regional Administrator, Region IV
C. F. Lyon, NRC Senior Project Manager
S. M. Schneider, NRC Senior Resident Inspector
Director of Consumer Health Services, Department of Regulation and Licensure,
Nebraska Health and Human Services, State of Nebraska

OPPD Response to NRC Request for Additional Information

1. NRC Question

Test OI-ST-ESF-0013 is referenced as an alternate means of testing the manual containment Isolation actuation function, however the scope of this test is not provided in the LAR. Please provide a description of surveillance test OI-ST-ESF-0013 similar to the description provided for the OP-ST-ESF-0011 test on page 4 of the LAR.

OPPD Response

There are three surveillance tests that are performed to meet TS 3.1, Table 3-2, Item 8. IC-ST-IA-0001, "Functional Test of Instrument Air to Containment Pressure Switches Loop PC-1849" satisfies in part, TS 3.1, Table 3-2, Item 8. OP-ST-EFS-0011, "Channel A and B Automatic and Manual Engineered Safeguard Actuation Signal Test" satisfies in part, TS 3.1, Table 3-2, Item 8.a. and Item 8.b. OP-ST-ESF-0013 "Channels A and B Steam Generator Isolation Signal Actuation Test (SGIS)" satisfies in part, TS 3.1, Table 3-2, Item 8.b.

IC-ST-IA-0001 verifies the setpoint of pressure switches PC-1849A and PC-1849B and the movement of valves PCV-1849A and PCV-1849B (Containment Instrument Air Isolation Valves). A review of setpoint values from the performance of this test over the last several outages found no gross deviation.

OP-ST-ESF-0011 simulates ESF logics and verifies the movement of the PCV-1849A and PCV-1849B valves, but does not verify the set point. As stated in License Amendment Request (LAR) 14-10, PCV-1849A and PCV-1849B are tested within the automatic and manual engineered safeguard actuation surveillance (i.e., OP-ST-ESF-0011) to ensure the valves properly close and isolate instrument air to Containment. This surveillance simulates a low air pressure signal to allow closure of these two valves with manual containment isolation initiation. This test was satisfactorily performed on June 22, 2013 and February 21, 2013.

LAR 14-10 intended to reference OP-ST-ESF-0013 and not OI-ST-ESF-0013 (there is no such procedure). OP-ST-ESF-0013, involves simulated actuation of the Containment Pressure High Signal (CPHS) which actuates Steam Generator Isolation Signal (SGIS) (Steam Generator Isolation Valve closure). During the test, the CPHS signal is simulated. SGIS lockout relays of Channel A and Channel B are independently energized and associated Steam Generator Isolation valves are verified closed. OP-ST-ESF-0013 does not verify low-pressure actuation of valves PCV-1849A and PCV-1849B. The SGIS test (OP-ST-ESF-0013) was satisfactorily performed on September 20, 2013 and December 11, 2009.

NRC Question

- 2. For Steam Generator Level Calibrations (TS 3.1, Table 3-1, item 6.c; TS 3.1, Table 3-2 Item 23.c.1; TS3.1, Table 3-3A, Item 7.b and 8.b) it is understood that calibrations are performed in a split loop manor with in-containment instruments being calibrated separately from the out-of-containment loop components. While it is understandable that the in-containment instrument calibrations cannot be performed during plant power operation due to inability to isolate the sensing instruments; the out-of-containment portions of these loops would remain accessible. The LAR does not include a justification for extension of the out of containment loop component calibrations. Please provide a description of measures being taken by the licensee, if any, to perform calibrations of the accessible components of these loops. If these component calibrations are to be extended, then additional justification for doing so will be required.**

OPPD Response

IC-ST-MS-0005, "Channel Calibration of Steam Generator RC-2A Wide Range Level Loop D/L-911," is a split-loop calibration. This test satisfies, in part, the requirements of TS 3.1, Table 3-2, Item 23.c.1 and Table 3-3A, Item 7.b. The only component within the loop that is located in containment and calibrated during an outage is D/LT-911 (Steam Generator Wide Range Level Transmitter). The out-of-containment loop components include AI-199-N7 (Multi-Nest Power Supply), D/LI-911/912 (Steam Generator RC-2A Wide Range Level Indicator), D/LYI-911 (Steam Generator Wide Range Level I/E Converter), D/LM-911 (Steam Generator Wide Range Level E/E Converter), D/LY2-911 (Steam Generator Wide Range Level E/I Converter), and D/LS-911-1 (Steam Generator Wide Range Level Absolute Alarm Bistable). The split-loop calibration for the out-of-containment loop components is scheduled to be performed on February 9, 2015. The surveillance interval late date including 25% extension time is March 7, 2015. The extension proposed by LAR 14-10 applies only to testing of components located in containment.

IC-ST-MS-0018, "Channel Calibration of Steam Generator RC-2A Narrow Range Level Loop A/L-901," is a split-loop calibration. This test satisfies, in part, the requirements of TS 3.1, Table 3-1, Item 6.c. The only component within the loop that is located in containment and calibrated during an outage is A/LT-901 (Steam Generator RC-2A Narrow Range Level Transmitter). The out-of-containment loop components include A/LQ-901 (Steam Generator RC-2A Narrow Range Level Loop Power Supply), A/LI-901 (Steam Generator RC-2A Narrow Range Level Indicator), and AI-31A-A/TU-04 (Steam Generator RC-2A Narrow Range Level Trip Unit). The split-loop calibration for the out-of-containment loop components is scheduled to be performed on February 10, 2015. The surveillance interval late date including 25% extension time is March 27, 2015. The extension proposed by LAR 14-10 applies only to testing of components located in containment.

IC-ST-MS-0034, "Calibration of Steam Generator RC-2A Level Loop L-903Y-1," is not a split-loop calibration. Two of the components, (i.e., the power supply and the level indicator) are located outside of containment; the transmitter is the only component located in containment. All three components are calibrated together during an outage. This test satisfies, in part, the requirements of TS 3.1, Table 3-3A, Item 8.b. The components calibrated by this test include LQ-903Y-1 (Steam Generator RC-2A Level Loop Power Supply), LI-903Y-1 (Steam Generator RC-2A Level Indicator), and LT-903Y-1 (Steam Generator RC-2A Level Transmitter). Justification for the extension is supported by data from completed surveillances since 2007, the review of which found that the level instrumentation was successfully tested without exception. Graphical and tabular data analysis indicates no outliers and no adverse trends. In addition, monthly channel checks (OP-ST-ASP-0001, "Alternate Shutdown Capability Instrumentation Functional Check"), are conducted on Steam Generator RC-2A Level Loop L-903Y-1 per TS 3.1, Table 3-3A, Item 8.a. The last four monthly performances of these channel checks were reviewed and without exception, were found acceptable. The monthly channel checks would indicate potential issues should they arise prior to the next performance of IC-ST-MS-0034.

IC-ST-MS-0035, "Calibration of Steam Generator RC-2B Level Loop L-906Y-1," is not a split-loop calibration. Two of the components, (i.e., the power supply and the level indicator) are located outside of containment; the transmitter is the only component located in containment. All three components are calibrated together during an outage. This test satisfies, in part, the requirements of TS 3.1, Table 3-3A, Item 8.b. The components calibrated by this test include LQ-906Y-1 (Steam Generator RC-2B Level Loop Power Supply), LI-906Y-1 (Steam Generator RC-2B Level Indicator), and LT-906Y-1 (Steam Generator RC-2B Level Transmitter). Justification for the extension is supported by data from completed surveillances since 2007, the review of which found that the level instrumentation was successfully tested without exception. Graphical and tabular data analysis indicates no outliers and no adverse trends. In addition, monthly channel checks (OP-ST-ASP-0001, "Alternate Shutdown Capability Instrumentation Functional Check"),

are conducted on Steam Generator RC-2B Level Loop L-906Y-1 per TS 3.1, Table 3-3A, Item 8.a. The last four monthly performances of these channel checks were reviewed and without exception, were found acceptable. The monthly check would indicate potential issues should they arise prior to the next performance of IC-ST-MS-0035.