

444 South 16th Street Mall Omaha, NE 68102-2247

LIC-15-0013 February 13, 2015

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

- Subject: Revised Response to NRC Request for Additional Information Regarding License Amendment Request (LAR) 13-03, Revising Method for Controlling Raw Water Intake Cell Level," dated August 13, 2014 (ML14226A738)(LIC-14-0092)
- References: 1. Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "License Amendment Request (LAR) 13-03, Request to Revise Updated Safety Analysis Report to Allow Implementation of Modification EC 55394, Raw Water Pump Operation and Safety Classification of Components during a Flood," dated August 16, 2013 (ML13231A178) (LIC-13-0105)
 - E-mails from NRC (J. Sebrosky / J. Rankin) to OPPD (B. Hansher), "Fort Calhoun Request for Additional Information Associated with License Amendment Request to Revise the Method for Controlling Raw Water Intake Cell Level During Floods (MF2591)," dated June 2, 5, 6, and 10, 2014 (ML14156A222 (June 5th E-mail) / ML14162A376 (June 10th E-mail)) (NRC-14-0086)
 - Letter from OPPD (L. P. Cortopassi) to NRC (Document Control Desk), "OPPD Response to NRC Request for Additional Information Regarding License Amendment Request (LAR) 13-03, Revising Method for Controlling Raw Water Intake Cell Level," dated August 13, 2014 (ML14226A738)(LIC-14-0092)

This letter provides a revised response to an NRC request for additional information (RAI) (Reference 2) regarding License Amendment Request (LAR) 13-03 (Reference 1), which proposed revisions to the Updated Safety Analysis Report (USAR) to allow implementation of Modification EC 55394, "Raw Water Pump Operation and Safety Classification of Components During a Flood."

U. S. Nuclear Regulatory Commission LIC-15-0013 Page 2

Specifically, the response to RAI 6 on the seismic classification of components has been revised to indicate components classified as Safety Class 3 will be qualified as Seismic Category I as part of the implementation of the modification. OPPD requests 180 days from issuance of the amendment to implement these changes.

This letter contains no regulatory commitments.

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 February 13, 2015.

Respectfully

Louis P. Cortopassi Site Vice President and CNO

LPC/CCS/brh

- 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
- Attachment: Revised Response to NRC Request for Additional Information Regarding License Amendment Request (LAR) 13-03, Revising Method for Controlling Raw Water Intake Cell Level

LIC-15-0013 Attachment Page 1

Revised Response to NRC Request for Additional Information Regarding License Amendment Request (LAR) 13-03, Revising Method for Controlling Raw Water Intake Cell Level

SBPB RAI 6

The new intake cell flood water inlet valves are classified as Safety Class 3. Per USAR Appendix N, Safety Class 3 corresponds to the USAS B31.7 Class III or ASME Section III Class 3 component design codes. The design conditions for Class 3 piping contained in these codes include a requirement to consider the effects of seismic events. Additionally, USAR Appendix N states that Safety Class 1, 2, and 3 components are considered to be Seismic Category I. In Section 3.6, the LAR states that the intake cell flood water inlet valves are not required to be seismically qualified or seismically supported. Provide justification for the discrepancy between the code requirements and the piping system with the intake cell flood water inlet valve design.

OPPD Response (Revised)

The intake cell flood water inlet valves installed under Modification EC 55394 are not required to be functional during a seismic event. These components are only credited for flooding events and are not credited for any other nuclear safety function. Components classified as Safety Class 3 will be qualified Seismic Category I and Limited – CQE (augmented quality) components directly supporting the SC-3 flood inlet valves will be seismically analyzed by piping analysis and/or the Seismic Qualification Utility Group (SQUG) methodology to demonstrate that the piping and components remain functional following a design basis earthquake. This will be completed under Modification EC55394.