

## **NRR-PMDAPEm Resource**

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**From:** Kim, James  
**Sent:** Friday, March 31, 2017 12:43 PM  
**To:** MATZKE, ERICK P  
**Cc:** BLOME, BRADLEY H  
**Subject:** Fort Calhoun - Final RAI regarding Administrative Control TS Change LAR (MF8437)

### Final Request for Additional Information

By letter dated September 28, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML16273A502), Omaha Public Power District (OPPD) submitted its License Amendment Request (LAR) proposing changes to the Fort Calhoun Station (FCS) Technical Specifications (TS), to the U.S. Nuclear Regulatory Commission (NRC) for approval. On March 24, 2017, NRC staff sent FCS the draft Request for Additional Information (RAI). This RAI relates to the proposed changes to staffing requirements, to reflect decommissioning, for FCS staff.

On March 29, 2017, a teleconference between FCS and NRC staff was held to discuss the information requested by the NRC staff was understood and any additional clarifications on the RAI were required. Based on the teleconference, FCS determined that the information requested by the NRC staff was clearly understood and any other additional clarifications on the RAI was not necessary. FCS agreed to provide a response to this **final** RAI shown below within 30 days from the date of this correspondence. The NRC staff also informed the licensee that a publicly available version of this final RAI would be placed in the NRC's ADAMS.

**REQUEST FOR ADDITIONAL INFORMATION REGARDING**  
**THE FORT CALHOUN STATION**  
**REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ALIGN STAFFING**  
**REQUIREMENTS FOR PERMANENTLY DEFUELED CONDITION (CAC NO. MF8437)**

1. In Technical Specifications (TS) Section "Definitions" the proposed definition for a Non-Certified Operator (NCO) states: "A NON-CERTIFIED OPERATOR is an individual who complies with the provisions of the NCO training program required by TS 5.3.1."

The NRC staff notes that TS 5.3.1 does not expressly address the NCO training program or describe its requirements. Provide information regarding whether NCO is a non-licensed operator and clarify the applicability of TS 5.3.1 requirements to the NCO qualification.

2. The current TS 5.2.1 states: "Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant." The proposed TS 5.2.1 states: "Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear fuel." Further, the proposed TS 5.2.1.b states, in part: "The plant manager shall be responsible for overall unit safe operation..."
  - a. Clarify why the proposed TS 5.2.1 continues to refer to "unit operation," and does not reflect the change

in safety concerns from an operating plant to a permanently defueled facility.

b. The proposed change to TS 5.2.1 involves replacing “nuclear power plant” with “nuclear fuel.” Section 3.0, “Technical Evaluation,” of the Enclosure to the OPPD’s letter dated September 28, 2016, does not describe the basis for the proposed change. Provide additional information describing the change basis for the proposed change to TS 5.2.1.

3. The current TS 5.2.1.c, states: “The corporate officer with responsibility for overall plant nuclear safety shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.” The proposed TS 5.2.1.c states: “The corporate officer with responsibility for overall management of nuclear fuel shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure safe management of nuclear fuel.”

Clarify why the proposed TS 5.2.1.c continues to use the term “plant,” and does not reflect the change in safety concerns from an operating plant to a permanently defueled facility. The same question also applies to TS 5.2.2, which refers to the “plant staff organization;” TS 5.3.1, which refers to the “plant staff;” TS 5.4.1, which refers to the “plant staff,” and TS 5.8.2.b, which refers to the “plant supervisory staff.”

4. The proposed TS 5.2.1.d states, in part: “The individuals who train the operating staff...may report to the appropriate onsite manager...” The basis for proposed changes to TS 5.2.1.d states, in part: “Changes to this section provides more consistent terminology reflecting the post defueled condition.”

Clarify why the proposed TS 5.2.1.d continues to refer to the “operating staff,” as opposed to identifying the specific positions to which this requirement will apply (such as, for example, only Certified Fuel Handlers, or all non-licensed operators.)

5. The proposed TS 5.2.2 states, in part: “The plant staff organization shall be as described in Chapter 12 of the USAR...” USAR Chapter 12.1, “Organization and Responsibility,” Revision 20, discusses manning the operating shift with Senior Reactor Operators and Reactor Operators, among other positions, which are proposed to be removed in the proposed TS for the permanently defueled condition.

Clarify the apparent inconsistency between the proposed TS 5.2.2 and Chapter 12 of the USAR.

6. The proposed TS 5.2.2.b states: “An individual qualified in Radiation Protection Procedures shall be onsite during fuel handling operations or movement over storage racks containing fuel.”

Provide additional information regarding whether the position described in TS 5.2.2.b can be vacant, in order to provide for unexpected absence of personnel, similar to the provisions found in the proposed Table 5.2.-1, “Minimum Shift Crew Composition,” Note (ii).

7. The proposed TS 5.2.2.c states: “The Shift Manager shall be a CERTIFIED FUEL HANDLER.” The basis for the proposed changes to TS 5.2.2.c states, in part: “This section is being revised to reflect the qualification requirements for fuel movement Shift Manager it removes the requirement for the supervision of fuel handling to have an SRO.”

The abovementioned statement in the basis for the proposed changes to TS 5.2.2.c is unclear; provide additional information clarifying the intent of the statement. Furthermore, provide additional information regarding whether the Shift Manager will be responsible for the shift command function.

8. The proposed TS 5.2.2.d states: “Fire protection program responsibilities are assigned to those positions and/or groups designated by asterisks in USAR 12.1-1 through 12.1-4 according to the procedures specified in Section 5.8 of the Technical Specifications.” USAR Figure 12.1-1, Revision 20; Figure 12.1-2, Revision 23; Figure 12.1-3, Revision 19, and Figure 12.1-4 Revision 20, include positions which are proposed to be removed in the proposed TS for the permanently defueled condition.

Clarify the apparent inconsistency between the proposed TS 5.2.2.d and Figures 12.1-1 through 12.1-4 of the USAR.

9. The proposed Table 5.2-1, "Minimum Shift Crew Composition," includes the column titled "License Category," which lists a Certified Fuel Handler and a Non-Certified Operator. The NRC staff notes that both the Certified Fuel Handler and a Non-Certified Operator are non-licensed operators.

Clarify the use of the "License Category" terminology, as used in the proposed Table 5.2-1.

10. The proposed Table 5.2-1, "Minimum Shift Crew Composition," Note (ii), states: "Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 5.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent."

Provide additional information regarding whether any shift crew position is permitted to be unmanned while fuel movements are in progress or movement of loads over fuel are in progress.

11. The current TS 5.8.1 states, in part: "Written procedures and administrative policies shall be established, implemented and maintained covering the following activities: b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33." The proposed TS 5.8.1.b remains unchanged.

Provide additional information regarding the applicability of TS 5.8.1.b to the facility in a permanently defueled condition.

12. TS Section 5.0 – page 5 included in the License Amendment Request (LAR) submitted by letter dated September 28, 2016 shows the changes marked on the page was that last updated by Amendment No. 259. The NRC staff notes that the most recent version of this page was last updated by Amendment No. 275, which was issued on June 16, 2014 (ADAMS Accession Number ML14098A092). The NRC staff further notes that Amendment No. 275 replaced the statement in TS 5.8.1.c with "Not used."

Clarify the apparent discrepancy in the version control of TS 5.0 – Page 5 submitted in the LAR and incorporate appropriate changes, as needed.

Regards,

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**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 3425

**Mail Envelope Properties** (James.Kim@nrc.gov20170331124200)

**Subject:** Fort Calhoun - Final RAI regarding Administrative Control TS Change LAR  
(MF8437)  
**Sent Date:** 3/31/2017 12:42:55 PM  
**Received Date:** 3/31/2017 12:42:00 PM  
**From:** Kim, James

**Created By:** James.Kim@nrc.gov

**Recipients:**  
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Tracking Status: None

**Post Office:**

Files	Size	Date & Time
MESSAGE	9334	3/31/2017 12:42:00 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**