UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 4[illegible] TO FACILITY OPERATING LICENSE NO. DPR-40

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

Introduction

By letters dated July 5, 1979 and May 12, 1980, OPPD requested changes to the Fort Calhoun Station, Unit No. 1 Technical Specifications (TS). The July 5, 1979 submittal proposed the removal of requirements that, when one train of a redundant system is inoperable, non-redundant pumps and valves in the remaining train be cycled. The May 12, 1980 submittal proposed additional requirements for ensuring the availability of auxiliary feedwater during plant operations.

Discussion and Evaluation

I. Non-redundant Pump and Valve Testing

By letter dated November 22, 1976, the NRC provided guidelines to OPPD for determining whether or not to exercise certain equipment during plant operations as part of the staff's Inservice Testing (IST) program review. On July 2, 1979 the NRC issued Amendment No. 46 to OPPD which revised the Fort Calhoun TS to incorporate the IST program requirements. The TS, however, require exercising certain non-redundant components when the other system is inoperable. These requirements are contrary to the guidance which the staff provided, and should, therefore, be changed.

The present operating practices at Fort Calhoun include the following controls in the event of inoperable safety related equipment:

1. Procedures exist and are implemented for administratively verifying operability of items whose redundant counterparts have been declared inoperable. These procedures shall also include administrative verification of operability of supporting and supported items. For example, when one of two ECCS pumps is taken out of service, appropriate logs or similar documents should be reviewed to verify operability of the other pump including availability of emergency power, water supplies, and other essential services, and operability of valves and other components in the train.

2. The administrative verification shall be initiated immediately upon discovering an item inoperable and be completed as expeditiously as possible. However, when equipment is to be taken out of service for maintenance the verification must be performed prior to removal from service.

3. If during the administrative verification a redundant counterpart to the inoperable item is discovered to also be inoperable, the LCO shall be considered as not being met and the plant shall be shut down or any remedial action permitted by the TS followed until the LCO can be met.

Since the present requirements are contrary to NRC guidance, and since the above administrative practices are in accordance with NRC philosophy, the staff finds the proposed changes to be acceptable.

II. Auxiliary Feedwater System Requirements

By letter dated May 12, 1980, OPPD proposed changes to the Fort Calhoun TS to clarify the requirements for ensuring the availability of auxiliary feedwater during plant operations. The proposed changes were in response to the NRC's Short Term Recommendations GS-2 and GS-6 contained in the staff's October 22, 1979 letter. These recommendations suggested that:

1. Recommendation GS-2 - The licensee should lock open single valves or multiple valves in series in the auxiliary feedwater system pump suction piping and lock open other single valves or multiple valves in series that could interrupt all auxiliary feedwater flow. Monthly inspections should be performed to verify that these valves are locked and in the open position. These inspections should be proposed for incorporation into the surveillance requirements of the plant TS; and

2. Recommendation GS-6 - The licensee should confirm flow path availability of an auxiliary feedwater system flow train that has been out of service to perform periodic testing or maintenance as follows:

   a. Procedures should be implemented to require an operator to determine that the auxiliary feedwater system valves are properly aligned and a second operator to independently verify that the valves are properly aligned, and

   b. The licensee should propose TS to assure that prior to plant startup following an extended cold shutdown, a flow test would be performed to verify the normal flow path from the primary auxiliary feedwater system water source to the steam generators. The flow test should be conducted with auxiliary feedwater system valves in their normal alignment.

The staff has reviewed OPPD's submittal and has determined that the proposed changes are in accordance with our recommendations. Since the changes are in accordance with NRC recommendations and since the changes add requirements to improve the assurance of auxiliary feedwater availability, the staff finds these changes to be acceptable.

Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: July 25, 1980