Omaha Public Power District 1623 Harney Omaha, Nebraska 68102-2247 402/536-4000

January 24, 1990 LIC-90-0011

U. S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Station P1-137 Washington, DC 20555

References:

1. Docket No. 50-285

 Letter from NRC (C. E. Rossi) dated November 21, 1989 (NRC Bulletin 89-03)

Gentlemen:

SUBJECT:

Response to NRC Bulletin 89-03 "Potential Loss of Required Shutdown Margin During Refueling Operations"

Reference 2 requested licensees to take NRC recommended actions to assure that adequate shutdown margin is maintained during all refueling operations. Omaha Public Power District will comply with the requested actions by:

- 1. Developing a kinfinity map of the assemblies in the final core reload configuration in order to evaluate any potential intermediate fuel assembly configurations (similar to the actions taken by Baltimore Gas and Electric Company for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2).
- Incorporating into Fort Calhoun Operating Procedure OP-11, "Reactor Core Refueling Procedure", a kinfinity map and procedure step changes which allow fuel to be positioned only in intermediate core locations that will contain fuel of equal or greater reactivity in the final core configuration.
- Conducting training with the operations staff on the revisions to OP-11 and on maintaining adequate shutdown margin.

These actions will be completed prior to beginning fuel movement during the 1990 Refueling Outage. The $k_{infinjty}$ map for procedure OP-11 will be revised for each subsequent core reload prior to beginning fuel movement for that cycle.

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This response is being submitted under oath in accordance with the reporting requirements of NRC Bulletin 89-03. If you have further questions on this matter or require additional information, please contact me.

Sincerely,

J. Morris Division Manager Nuclear Operations

KJM/pjc

c: LeBoeuf, Lamb, Leiby & MacRae R. D. Martin, NRC Regional Administrator, Region IV A. Bournia, NRC Project Manager

P. H. Harrell, NRC Senior Resident Inspector

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of

Omaha Public Power District (Fort Calhoun Station Unit No. 1) Docket No. 50-285

AFFIDAVIT

K. J. Morris, being duly sworn, hereby deposes and says that he is the Division Manager - Nuclear Operations of the Omaha Public Power District; that as such he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached information concerning the response to NRC Bulletin 89-03; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information, and belief.

K. J. Morris Division Manager Nuclear Operations

STATE OF NEBRASKA)

COUNTY OF DOUGLAS)

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Subscribed and sworn to before me, a Notary Public in and for the State of Nebraska on this 24 day of January, 1990.

Notary Public Wans

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