



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 160 TO FACILITY OPERATING LICENSE NO. DPR-40  
OMAHA PUBLIC POWER DISTRICT  
FORT CALHOUN STATION, UNIT NO. 1  
DOCKET NO. 50-285

1.0 INTRODUCTION

By letter dated September 15, 1993, Omaha Public Power District (OPPD) submitted a request for changes to the Fort Calhoun Station, Unit No. 1 (FCS) Technical Specifications (TSs). The requested changes would implement Generic Letters (GLs) 86-10 and 88-12. The existing license conditions are supplemented with the standard condition on fire protection noted in GL 86-10, and proposed changes to the TSs for FCS are also incorporated. The proposed changes would remove requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements, as recommended by GL 86-10. The proposed changes would also modify the administrative control requirements of the TSs to add requirements for the Fire Protection Program that are similar to requirements for other programs implemented by license conditions. Guidance on these proposed changes to TSs was provided to all power reactor licensees and applicants by GL 88-12, dated August 2, 1988.

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the Fire Protection Programs for all power reactor facilities. Because of the extensive modification of Fire Protection Programs and the number of open issues resulting from staff evaluations, a number of revisions and alterations were made to these programs over the years. Consequently, licensees were requested by GL 86-10 to incorporate the final NRC-approved Fire Protection Program in their Updated Safety Analysis Reports (USARs). In this manner, the Fire Protection Program--including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection--would have a status consistent with that of other plant features described in the USAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the Fire Protection Program as described in the USAR, should be used to ensure uniform enforcement of fire protection requirements. Finally, the Commission stated that, in implementing these requested actions, licensees may request an amendment to delete the fire protection TSs that would now be unnecessary.

The licensees for the Callaway and Wolf Creek plants submitted lead-plant proposals to remove fire protection requirements from their TSs. This action

was an industry effort to obtain NRC guidance on an acceptable format for license amendment requests to remove fire protection requirements from TSs. Additionally, in the licensing review of new plants, the staff has approved applicant requests to remove fire protection requirements from TSs issued with the operating license. Thus, on the basis of the lead-plant proposals and the staff's experience with TSs for new licenses, GL 88-12 was issued to provide guidance on removing fire protection requirements from TSs.

## 2.0 EVALUATION

The NRC staff reviewed the license amendment request for Fort Calhoun Station against the guidance provided in GLs 86-10 and 88-12. GL 86-10 requested that the licensee incorporate the NRC-approved fire protection program in its USAR for the facility and specified a standard fire protection license condition. GL 88-12 addressed the elements a licensee should include in a license amendment request to remove fire protection requirements from TSs. These elements are as follows: (1) the NRC-approved fire protection program must be incorporated into the USAR; (2) the limiting conditions of operations and surveillance requirements associated with fire detection systems, fire suppression systems, fire barriers, and the administrative controls that address fire brigade staffing would be deleted from the TSs (the existing administrative controls related to fire protection audits would be retained in the TSs); (3) all operational conditions, remedial actions, and test requirements presently included in the TSs for these systems, as well as the fire brigade staffing requirements, shall be incorporated into the fire protection program; (4) the standard fire protection license condition specified in GL 86-10 must be included in the facility operating license; (5) the Unit Review Group (Onsite Review Group) shall be given responsibility for the review of the fire protection program and implementing procedures and for the submittal of recommended changes to the Company Nuclear Review and Audit Group (Offsite or Corporate Review Group); and (6) fire protection program implementation shall be added to the list of elements for which written procedures shall be established, implemented, and maintained.

The TS changes proposed by the licensee are in accordance with the guidance provided by GL 88-12, as addressed below.

- (1) TS 5.5.1.6, "PRC Responsibilities," is revised to add the review of the fire protection program implementation and the submittal of the recommended changes to the SARC. TS 5.5.2.1, "SARC Function," is revised to add fire protection to the list of areas for which the SARC is responsible. However, subsequent to GL 88-12, FCS implemented the Qualified Reviewer Program in Amendment No. 149. The Qualified Reviewer Program requires that a determination be made as to whether a cross-disciplinary review and a 10 CFR 50.59 safety evaluation are required for a procedure change. If a 10 CFR 50.59 evaluation is required, the PRC must review the proposed procedure. FCS proposed that the Fire Protection Program implementing procedures be included as part of the Qualified Reviewer Program. Review of the Fire Protection Program Plan will be added as a

separate responsibility of the PRC. The intent of the GL is met by having the onsite and offsite review committees approving all changes to the Fire Protection Program Plan, and reviewing significant changes to the implementing procedures. The licensee has, therefore, satisfied element 5 of GL 88-12.

- (2) TS 5.8, "Procedures," is revised to add Fire Protection Program implementation to those programs for which written procedures shall be established and maintained (TS 5.8.5). TS 5.8.2 is revised to add the Fire Protection Program to those procedures reviewed in accordance with TS 5.5.1.6. The licensee has, therefore, satisfied element 6 of GL 88-12.
- (3) TS 2.19, "Fire Protection System," and the associated basis for fire detection instrumentation, fire detection zones, Halon system and Halon area fire zones, fire suppression water systems, sprinkler system, fire hose stations, and penetration fire barrier are removed and incorporated into the USAR. TS 3.15, "Fire Protection System," and the associated basis for fire detection, fire suppression water system, sprinkler system, fire hose station, penetration fire barriers, diesel fire pump, fire pump diesel, Halon system and smoke detectors are removed and incorporated into the USAR. Item 7 of TS 3.2, "Equipment and Sampling Tests," Table 3.5, "Fire Protection Pumps & Power Supply Test," is removed and incorporated into the USAR. The definition of fire suppression water system on page 7 is also removed. Table of Contents pages ii, iv, and vi are revised to reflect the removal of TSs 2.19 and 3.15 and Tables 2-7 and 2-8. Item e of TS 5.2.2, "Plant Staff," and the reference to the Fire Brigade in the associated footnote "#" on fire brigade staffing requirements are removed and incorporated into the USAR. Item 2 (on the fire brigade training program) of TS 5.4, "Training," is removed and incorporated into the USAR. The licensee has, therefore, satisfied elements 1, 2, and 3 of GL 88-12.
- (4) Item h of TS 5.9.3, "Special Report," is removed. Item c is added to TS 5.9.4, "Unique Reporting Requirements," to provide an additional reporting requirement.

As required by GL 86-10, the licensee incorporated the NRC-approved Fire Protection Program into the USAR. The licensee has, therefore, satisfied element 1 of GL 88-12.

The licensee confirmed that the following standard condition on the Fire Protection Program provided in GL 86-10 will be added to the existing licensing conditions. The licensee has, therefore, satisfied element 4 of GL 88-12.

Omaha Public Power District shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Safety Analysis Report for the facility and as approved in the SERs dated

February 14, and August 23, 1978, November 17, 1980, April 8, and August 12, 1982, July 3, and November 5, 1985, July 1, 1986, December 20, 1988, November 14, 1990, March 17, 1993, and January 14, 1994, subject to the following provision:

Omaha Public Power District may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

On the basis of its review of the above items, the staff concluded that the licensee has met the guidance of GL 88-12. Therefore, the staff finds the proposed changes acceptable. The FCS TS do not include TS for alternative shutdown equipment as specified in GL 81-12. The staff will pursue implementation of alternative safe shutdown equipment TS, consistent with GL 81-12, independent of this license amendment.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Nebraska State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (58 FR 59753). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: January 14, 1994