Omaha Public Power District
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402/636-2000

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LIC-94-0074

U. S. Nuclear Regulatory Commission
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References: 1. Docket No. 50-285
2. Letter from NRC (A. Bournia) to OPPD (R. L. Andrews) dated February 17, 1988
3. Letter from OPPD (R. L. Andrews) to NRC (Document Control Desk) dated May 27, 1988 (LIC-88-384)
4. Letter from OPPD (R. L. Andrews) to NRC (Document Control Desk) dated June 28, 1988 (LIC-88-477)

Gentlemen:

SUBJECT: Revision to Commitment in Analysis Supporting Compliance with NUREG-0737, Item II.D.1 - Relief and Safety Valve Test Requirements

The purpose of this letter is to document a revision to a licensing basis commitment. A requirement of NUREG-0737, Item II.D.1 was that plant specific power operated relief valve (PORV) control circuitry be qualified for design-basis transients and accidents. These requirements could be satisfied if certain conditions were met. In the responses (References 3 and 4) to an NRC request for additional information (Reference 2), Omaha Public Power District (OPPD) provided analyses of expected PORV operation and plant response during various plant operating modes for Fort Calhoun Station (FCS).

Included with Reference 4 were discussions concerning the operation of the Low Temperature Over-Pressure Protection (LTOP) system and the Pressurizer Pressure Low Signal (PPLS). In Section 3.0 of the attachment to Reference 4, OPPD discussed Normal Operation Configuration - LOCA Response, as follows:

> *The LOCA response of the LTOP circuit due to temperature input failure would generate a PORV open signal. This would be prevented during power operation by PPLS being unblocked which disables the control capability of the LTOP circuit.*
>
> *The area of concern here is the post-LOCA action where engineered safeguards are reset. PPLS must be blocked as the first step to reset safeguards, which could automatically open the PORVs. OPPD will add a step to AOP-23, Safeguards Reset Procedure, to clearly require the PORV control switches to be placed in "close" position prior to blocking PPLS. The control circuitry required to prevent energization of the PORVs would not be subjected to a potentially harsh environment.*

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OPPD personnel recently determined that, although the intent of the commitment has been met by appropriate means, the underlined action statement quoted above was not implemented. This determination resulted from recent verification of the FCS ongoing commitments (i.e., repetitive or living NRC commitments).

The actions cited in the quoted statement were determined to be inappropriate for two reasons. First, the condition OPPD was addressing in Reference 4 is post-LOCA. AOP-23 is specifically intended for reset of an inadvertent safeguards actuation, and would therefore not be used to reset PPLS following a LOCA. Second, the initiation of LTOP still occurs, even if an Emergency Operating Procedure is in use. Placing the PORV control switch in "close" position defeats LTOP, which is an undesirable action.

Instead of revising AOP-23 as noted above, OPPD has taken actions as follows. Abnormal and Emergency Operating Procedures AOP-22 (Reactor Coolant Leak), EOP-03 (Loss of Coolant Accident), EOP-04 (Steam Generator Tube Rupture), EOP-05 (Uncontrolled Heat Extraction), EOP-06 (Loss of All Feedwater), and EOP-20 (Functional Recovery Procedure) contain steps to initiate LTOP. Steps have been added to these procedures to ensure that both T-113 and T-123 (non-EEQ temperature input instrument loops to the LTOP circuitry) have not failed prior to blocking PPLS. If either temperature loop has failed, then the PORV block valves are to be closed, thus counteracting the LTOP system. (The pressure input instrument loops to the LTOP circuitry are classified as EEQ for harsh environment.) EOP-07 (Station Blackout) requires opening the breakers for the PORVs so that upon restoration of power to the Motor Control Centers, the PORVs will not open. The block valves are motor operated and thus cannot be closed during a loss of power.

Although the preceding discussion corrects a specific action statement in one portion of the Reference 4 letter, this correction does not affect the conclusion that FCS is in compliance with applicable NRC requirements for PORV operation. The need for this correction was revealed during the implementation of the FCS Ongoing Commitment Program, which has been developed to better identify and maintain licensing basis commitments.

Please contact me if you have any questions.

Sincerely,

W. G. Gates

W. G. Gates
Vice President

WGG/tcm

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