



Omaha Public Power District

1623 HARNEY ■ OMAHA, NEBRASKA 68102 ■ TELEPHONE 536-4000 AREA CODE 402

October 27, 1982

LIC-82-352

Mr. D. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Eisenhut:

Technical Specifications for Selected NUREG-0737 Items

The Commission's letter (Generic Letter 82-16) dated September 20, 1982 identified several NUREG-0737 items for which it is necessary to include operability, surveillance, and/or reportability statements into the Technical Specifications (TS) following their implementation. The letter requested the District review each of these items and submit a license amendment application for those items which are not sufficiently addressed in the Fort Calhoun Station TS's. The District has reviewed these TMI Action Plan items and discussion of their inclusion into the TS's is detailed in the attachment. Please note that two items have been identified as requiring TS inclusion and a license amendment application addressing these items will be forwarded under separate cover.

Sincerely,

W. C. Jones
Division Manager
Production Operations

WCJ/TLP:jmm

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

A044

Attachment

OMAHA PUBLIC POWER DISTRICT'S RESPONSE
TO ONRR LETTER DATED SEPTEMBER 20, 1982

1) STA Training (Item I.A.1.1.3)

In accordance with the Commission's letter dated July 2, 1980, the District submitted a license amendment application which addressed the qualifications, training, and on-duty requirements for Shift Technical Advisors at the Fort Calhoun Station. License Amendment No. 54 dated January 19, 1981 incorporated these requirements into the Technical Specifications (TS). No further action is required by the District.

2) Limit Overtime (Item I.A.1.3)

The District will incorporate into the "Administrative Controls" section of the TS's a statement addressing overtime limitations for key plant personnel which meets the intent of the model TS detailed in Enclosure 2 to the Commission's letter dated September 20, 1982. The license amendment application incorporating this statement will be submitted under separate cover. The District recently implemented Standing Order G-52 which provides administrative limits on plant staff working hours consistent with the guidelines provided in Generic Letter 82-12.

3) Short Term Auxiliary Feedwater System Evaluation (Item II.E.1.1)

The Commission's letter dated March 1, 1982 closed out this item for the District. Limiting conditions for operation and surveillance requirements for the Fort Calhoun Station auxiliary feedwater (AFW) system in the short term were incorporated by License Amendment No. 49. Item 4) below details further Technical Specifications changes. No further action is necessary.

4) Safety-Grade AFW System Initiation and Flow Induction (Item II.E.1.2)

Amendment No. 54 to the Fort Calhoun Station license incorporated the necessary TS requirements for the control grade AFW system. Amendment No. 54 was then superseded by Amendment No. 65 which incorporated limiting conditions for operation and surveillance requirements for the installed safety-grade AFW system. No further action is required.

5) Dedicated Hydrogen Penetrations (Item II.E.4.1)

The Commission's letter dated August 14, 1981 closed out this item for the District. The Fort Calhoun Station presently has dedicated hydrogen penetrations and the isolation valves for these penetrations are tested in accordance with 10 CFF 50, Appendix J, requirements. TS Section 3.5, Reference 3 (Reactor Containment Building Leak Rate Test, Supplementary Report, dated June, 1973), pages 4 and 5, adequately details the Type C testing conducted on these containment penetration isolation valves. No further action is required.

6) Containment Pressure Setpoint (Item II.E.4.2.5)

The Commission's letters dated July 28, 1981 and February 24, 1982 closed out this item for the District. TS Sections 2.6 and 2.14 presently address the subject pressure setpoint; therefore, no further action is necessary.

7) Containment Purge Valve (Item II.E.4.2.6)

The District's license amendment application dated November 3, 1981, as revised by letter dated April 29, 1982, provided the necessary limiting conditions for operation and surveillance requirements for the 42-inch purge valves. This application is presently being reviewed by the Commission and, upon approval, will provide operability and testing requirements for these valves. Since an amendment application has been submitted, no further action is required.

8) Radiation Signal on Purge Valves (Item II.E.4.2.7)

The District's letter dated February 12, 1982 and TS Sections 2.14 and 2.15 and Tables 2-1, 2-4, and 3-2 detail the equipment, operability, initiation, and surveillance requirements associated with closure of the containment purge and vent valves on a high radiation signal. Generic Letter 82-16 indicates that TS's should include a limiting condition for operation on the radiation monitors that provides the signal to automatically close the purge (and vent) valves upon sensing high radiation in the containment atmosphere. This limiting condition for operation requires that at least one monitor must be operable at all times, except during cold and refueling shutdowns. If one is not operable, the plant must proceed to cold shutdown within 24 hours or close the purge and/or vent valves within 24 hours. The Fort Calhoun Station TS sections and tables detailed above, together with the notes to these tables, presently include similar statements and the District believes no further action is required.

9) Upgrade B&W AFW System (Item II.K.2.8)

This item is not applicable to the Fort Calhoun Station and, thus, no action is required.

10) PWR Thermal-Mechanical Report (Item II.K.2.13)

The District's letter dated December 31, 1981 addressed the District's analysis results and position regarding this item. As stated in Generic Letter 82-16, the staff is presently reviewing the District's response and the PWR thermal shocking issue and the staff will determine if a TS change is necessary. Presently, no further action is required by the District.

11) Reporting Safety Valve and Relief Valve Failures and Challenges
(Item II.K.3.3)

Enclosure 8 to the District's letter dated December 31, 1980 detailed that failure of a pressurizer PORV and/or safety valve to close would be reported promptly to the Commission and that any valve challenges would be summarized in the monthly operating report. The District will include these reporting requirements in the amendment application addressed in Item 2) above.

12) Anticipatory Trip on Turbine Trip (Item II.K.3.12)

This item is applicable only to Westinghouse designed operating plants and no action is required for the Fort Calhoun Station.