



Omaha Public Power District

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October 27, 1982

LIC-82-354

Mr. Robert A. Clark, Chief
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Operating Reactors Branch No. 3
Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Clark:

Fort Calhoun Station Technical Specifications (TS)
Amendment Application Regarding
Inoperability of RPS/ESFAS Channels

The Commission's letter to Omaha Public Power District dated September 20, 1982 delineated changes to the District's TS amendment application dated July 22, 1980, as supplemented by letter dated June 15, 1982, that would be acceptable to the Commission for resolving the subject issue. The District has given careful consideration to the staff's proposed TS changes and continues to have concerns on implementing these changes for the reasons detailed below.

The District's June 15, 1982 amendment application supplement requested that for the purpose of testing and maintenance, a single inoperable high power level, thermal margin/low pressurizer pressure, and axial power distribution channel may be bypassed for 7 days if the inoperability is determined to be a result of malfunctioning RTD's or nuclear detectors. The District has requested this additional channel bypass time for the above described circumstances and channels because the normally inaccessible RTD's and nuclear detectors require a reasonable amount of time to repair and because of a concern regarding the increased probability for spurious tripping of the plant. The District is concerned that 48 hours is not sufficient time to effect repairs and that the inoperable RPS channel will then have to be placed in the tripped position, resulting in a 1-out-of-3 channel trip logic. Operating experience at the Fort Calhoun Station has demonstrated that channel noise can also result in the tripping of a channel and, thus, the potential for spurious plant trips is obvious. The District believes the potential economic loss from these spurious trips is not commensurate with the incremental increase in purported safety achieved by solely utilizing the 48-hour bypass criteria for all RPS channels. In addition,

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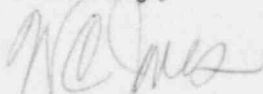
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it is the District's engineering judgment that these spurious trips can increase the number of challenges to the Fort Calhoun Station safety systems. The District believes that any gain in safety achieved through the Commission's proposed changes may be negated by these system challenges and transients. Finally, maintaining the RPS/ESFAS channels in an operable condition is of prime importance in this issue, and the District's proposed 7 day bypassing can achieve this purpose and still maintain a high degree of safety to the plant and public during this time.

The District's proposed TS's for the high rate trip-wide range log channels, as detailed in the June 15, 1982 submittal, are justified since this system is not credited in the Updated Safety Analysis Report (USAR). As stated in the Discussion section of the subject letter, these channels perform an anticipatory function and are redundant to the Variable Over Power Trip (VOPT) circuit of the high power level trip system. Because there will be no reduction in plant safety by implementing the District's proposed TS's for these channels, the District believes the TS's, as proposed in our June 15, 1982 letter, are still valid.

The District respectfully requests that the Commission reconsider the District's June 15, 1982 letter and proposed TS's detailed therein. The potential economic impact, additional challenges to safety systems, the design and performance of the existing protective systems, and the estimated cost for a backfit to provide additional redundancy are several pertinent items which should be included in your consideration of this issue.

Sincerely,



W. C. Jones
Division Manager
Production Operations

WCJ/TLP:jmm

cc: LeBoeuf, Lamb, Leiby & MacRae
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Mr. E. G. Tourigny, NRC Project Manager