

TABLE 2-6(a)
(Continued)

*Snubber No.	Elevation	Accessible During Normal Operation	Inaccessible During Normal Operation	Located In High Radiation Areas During Shutdown	Difficult to Remove for Functional Testing
FWS-74	1053' 0"	X			
FWS-75A	1053' 0"	X			
FWS-78	1038' 4"	X			
FWS-79	1049' 6"	X			
FWS-80	1049' 6"	X			
FWS-81	1049' 6"	X			
FWS-83	1033' 4"	X			
FWS-86A	999' 0"	X			
FWS-87	999' 0"	X			
FWS-88	999' 0"	X			
FWS-88A	999' 0"	X			
FWS-89	1002' 6"	X			
FWS-90	1001' 6"	X			
FWS-90A	1005' 6-5/8"	X			
FWS-91	1019' 0"	X			
FWS-92	1019' 0"	X			
FWS-92A	1026' 0"	X			
FWS-93	1032' 0"	X			
FWS-94	1032' 0"	X			
FWS-95	1032' 0"	X			
FWS-96	1032' 0"	X			X
FWS-97	1032' 0"	X			X
FWS-98	1032' 0"	X			X
FWS-100	1039' 0"	X			
FWS-101	1039' 0"	X			
HCV-327-S	1025' 0"		X		
HCV-329-S	1025' 0"		X		
HCV-331-S	1025' 0"		X		
HCV-333-S	1025' 0"		X		
MSS-1	1054' 7"		X		X
MSS-2	1054' 8-1/2"		X		X
MSS-3	1038' 0"		X		
MSS-4					
Top	1038' 6"		X		X

TABLE 2-6(a)
(Continued)

*Snubber No.	Elevation	Accessible During Normal Operation	Inaccessible During Normal Operation	Located in High Radiation Areas During Shutdown	Difficult to Remove for Functional Testing
RCS-21	1032' 0"		X		
RCS-22	1037' 6"		X		
RCS-23-					
Bottom	1032' 0"		X		
RCS-25	1033' 0"		X		
RCS-27	1052' 9"		X		
RCS-28	1052' 9"		X		
RCS-30	1045' 6"		X		
RCS-30A	1047' 0"		X		
RCS-31	1052' 0"		X		
RCS-32	1052' 0"		X		
RCS-33	1052' 0"		X		
RCS-34	1047' 0"		X		
RCS-39	1048' 0"		X		
RCS-41	1048' 0"		X		
RCS-42	1007' 9"		X		
RCS-44	1007' 9"		X		
RCS-45-					
Top	1009' 6"		X		
RCS-45-					
Bottom	1009' 6"		X		
RCS-47-					
Top	1009' 6"		X		
RCS-47-					
Bottom	1009' 6"		X		
RCS-49	1009' 6"		X		
RCS-51	1007' 9"		X		

TABLE 2-6(a)
(Continued)

*Snubber No.	Elevation	Accessible During Normal Operation	Inaccessible During Normal Operation	Located In High Radiation Areas During Shutdown	Difficult to Remove for Functional Testing
RCS-52	1007' 9"		X		
RCS-64					
Top	1032' 0"		X		
RWS-79	1046' 0"	X			X
RWS-128A	998' 8-1/2"	X			
RWS-128B	998' 8-1/2"	X			
RWS-130	998' 8-1/2"	X			
RWS-131	998' 8-1/2"	X			
SG-A1	1049' 0"		X		X
SG-A2	1049' 0"		X		X
SG-A3	1049' 0"		X		X
SG-A4	1049' 0"		X		X
SG-B1	1049' 0"		X		X
SG-B2	1049' 0"		X		X
SG-B3	1049' 0"		X		X
SG-B4	1049' 0"		X		X
SIS-1	979' 6"	X			
SIS-1A	979' 6"	X			
SIS-3	979' 6"	X			
SIS-4	979' 6"	X			
SIS-4A	979' 6"	X			
SIS-5	979' 6"	X			
SIS-5A	979' 6"	X			
SIS-6	979' 6"	X			
SIS-6A	979' 6"	X			
SIS-7	979' 6"	X			
SIS-8	979' 4"	X			
SIS-8B	979' 6"	X			
SIS-8C	979' 6"	X			
SIS-9	979' 6"	X			
SIS-9A	979' 6"	X			
SIS-9B	979' 6"	X			
SIS-10	983' 6"	X			
SIS-11	983' 6"	X			
SIS-16	981' 6"	X			
SIS-16A	981' 6"	X			
SIS-17	979' 6"	X			

TABLE 2-6(a)
(Continued)

*Snubber No.	Elevation	Accessible During Normal Operation	Inaccessible During Normal Operation	Located In High Radiation Areas During Shutdown	Difficult to Remove for Functional Testing
SIS-17A	979' 6"	X			
SIS-18	979' 6"	X			
SIS-19	979' 6"	X			
SIS-20	979' 6"	X			
SIS-21	979' 6"	X			
SIS-21A	981' 6"	X			
SIS-21B	981' 6"	X			
SIS-21C	981' 6"	X			
SIS-22	981' 6"	X			
SIS-23	981' 6"	X			
SIS-24	983' 6"	X			
SIS-24A	983' 6"	X			
SIS-26	979' 6"	X			
SIS-27	981' 6"	X			
SIS-27A	981' 6"	X			
SIS-27B	981' 6"	X			
SIS-28	980' 0"	X			
SIS-28A	980' 0"	X			
SIS-29	980' 0"	X			
SIS-30	979' 6"	X			
SIS-30A	979' 6"	X			
SIS-31	981' 6"	X			
SIS-31A	981' 6"	X			
SIS-32	980' 0"	X			
SIS-32A	980' 0"	X			
SIS-32B	980' 0"	X			
SIS-33-Top	981' 6"	X			
SIS-33- Bottom	981' 6"	X			X
SIS-34	980' 0"	X			
SIS-35-Top	980' 0"	X			
SIS-35- Bottom	980' 0"	X			
SIS-36-Top	974' 6"	X			

TABLE 2-6(a)
(Continued)

*Snubber No.	Elevation	Accessible During Normal Operation	Inaccessible During Normal Operation	Located In High Radiation Areas During Shutdown	Difficult to Remove for Functional Testing
SIS-162	1014' 6"		X		
SIS-164	1014' 0"		X		
SIS-165	1014' 6"		X		
SIS-165A	1014' 6"		X		
Top					
SIS-165A	1014' 6"		X		
Bottom					
SIS-166	1014' 6"		X		
SIS-167	1014' 6"		X		
SIS-168	1014' 6"		X		
SIS-168A	1014' 6"		X		
Top					
SIS-168A	1014' 6"		X		
Bottom					
SIS-169	1007' 7"	X			
SIS-169A	1007' 7"	X			
SIS-170	1007' 8"	X			
SIS-170A	1007' 5"	X			
SIS-172	1032' 0"	X			
SIS-173	1036' 8"	X			
SIS-174	1049' 2"		X		
SIS-174A	1049' 6"		X		
SIS-174B	1051' 7-1/4"		X		X
SIS-174C	1052' 6"		X		X
SIS-174D	1063' 7-1/4"		X		X
SIS-174E	1064' 6"		X		X
SIS-175	1057' 0"		X		X
SIS-175A	1056' 5-1/2"		X		
SIS-176B	1052' 6"		X		X
SIS-176C	1051' 7-1/4"		X		X
SIS-176D	1064' 6"		X		X
SIS-176E	1063' 7-1/4"		X		X
SIS-176G	1074' 0"		X		X
SIS-176H	1074' 0"		X		X

TABLE 2-6(a)
(Continued)

*Snubber No.	Elevation	Accessible During Normal Operation	Inaccessible During Normal Operation	Located In High Radiation Areas During Shutdown	Difficult to Remove for Functional Testing
SIS-183	1055' 9-1/2"		X		
SIS-184	979' 6"	X			
SIS-185	979' 6"	X			
SIS-187	983' 6"	X			
SIS-188	988' 6"	X			
SIS-202	1009' 0"	X			
SIS-204	995' 0"	X			
SIS-205	979' 6"	X			
SIS-206	983' 6"	X			
SIS-208	1003' 1-1/8"	X			
WDS-107	1004' 0"	X			
WDS-122 Right	991' 6"	X			
WDS-122 Left	991' 6"	X			

NOTE: Modifications to this table due to changes in high radiation areas should be submitted to the NRC as part of the next licensing amendment request.

*Location

ACS Auxiliary Coolant System
AFW Auxiliary Feedwater System
FWS Feedwater System
MSS Main Steam System
RCP Reactor Coolant Pump
RCS Reactor Coolant System
RWS Raw Water System
SG Steam Generator
SIS Safety Injection System
WDS Waste Disposal System

TABLE 3-6

REACTOR COOLANT PUMP SURVEILLANCE

<u>Requirement</u>	<u>Method</u>	<u>Frequency</u>
1.1 Reactor Coolant Pump Flywheels	Visual inspection of upper surface of top disc and bottom surface of bottom disc; volumetric inspection from circumference of <u>all</u> disc segments.	When motor is disassembled for maintenance purposes.

TABLE 3-7

CAPSULE REMOVAL SCHEDULE

<u>Removal Schedule</u>	<u>Refueling Schedule EFPY</u>	<u>Capsule Removed</u>
1	2.6	225°
2	5.9	265°
3	10	45°
4	17	85°, 95°, 275°
5	24	85°, 95°, 275°
6	Standby	Any Remaining Capsule
7	Standby	225°*
8	Standby	265°*

The alternative capsule for removal should be determined prior to attempting removal of any scheduled capsule.

*Replacement capsule assemblies were installed in the 225° and 265° locations after early withdrawal of the original 265° capsule. These capsules will benchmark the change in core loading design initiated at 5.9 EFPY.

DISCUSSION AND SIGNIFICANT HAZARDS
CONSIDERATION FOR UPDATES TO THE
SHOCK SUPPRESSOR OPERABILITY TABLE 2-6(a)

Table 2-6(a) was updated with minor changes. There was one snubber name changed from SIS-178 to SIS-23 to avoid confusion with a solid strut, also designated SIS-178. MSS-3 and SIS-183, shown as "Accessible During Normal Operation", should correctly be listed as "Inaccessible During Normal Operation" and RWS-89 should actually be listed as RWS-79.

Facility License Change 80-09, Amendment No. 59 to the Technical Specifications, changed the name of snubber SIS-174BB to SIS-176. There has been a labeling problem with supports associated with these numbers and there has, in fact, never been a snubber designated as SIS-174BB. Therefore, SIS-176 (formerly SIS-174BB) should be deleted from Table 2-6(a).

In response to NUREG-0737, an analysis was performed on the Fort Calhoun pressurizer overpressure protection system to determine equipment operability in the event of valve opening. The systems analyzed included the PORV's, safety valves, related upstream and downstream piping, and piping restraints. The analysis was based on NRC sanctioned computer codes RELAP 5, FORCE, and TPIPE.

Results of the analysis show that if the PORV's were to open with the piping and restraints in their previous configuration, very large water hammer forces would occur in the downstream piping. These forces would overstress both the pipe and the restraints. Modification of the system had to be made to reduce these overstressed conditions. After analyses of several different restraint configurations, the optimum configuration was determined and the following changes to Table 2-6(a) are required:

Delete

RCS-23 Top
RCS-23A
RCS-24 Top
RCS-24 Bottom
RCS-26

Add

RCS-64 Top

The following is a summary of the proposed changes to Table 2-6(a) of the Technical Specifications:

SIS-178	Changed to SIS-23
MSS-3	Listed as "Inaccessible During Normal Operation"
SIS-183	Listed as "Inaccessible During Normal Operation"
RWS-89	Changed to RWS-79
SIS-176	Deleted
RCS-23 Top	Deleted
RCS-23A	Deleted
RCS-24 Top	Deleted
RCS-24 Bottom	Deleted
RCS-26	Deleted
RCS-64 Top	Added

The following significant hazards considerations have been made pursuant to 10 CFR 50.92:

- (1) Will the change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated. The standards used in the design and installation of the shock suppressors were at least as conservative as those used during initial construction. The analysis of the shock suppressors was performed using accepted computer codes. As required by Technical Specifications, an independent review of the engineering justification was performed and the justification was found to be valid. The changes to the shock suppressor list were reviewed and approved by the Safety Audit and Review Committee, as is also required by the Technical Specifications.

- (2) Will the change create the possibility of a new or different type of accident from any accident previously evaluated?

No. The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated. Some of the changes were administrative in nature. These do not change the design, operability, or surveillance requirements of the snubber systems and, therefore, could not create the possibility of an unevaluated accident. The remaining changes are due to modifications of the snubber systems which were performed to reduce the possibility and consequences of a previously evaluated accident; therefore, the changes could not create the possibility of an unevaluated accident.

- (3) Will the change involve a significant reduction in the margin of safety?

No. The proposed change will not involve a significant reduction in a margin of safety. The changes are either administrative in nature or stem from an attempt to decrease the possibility and consequences of an accident or increase the margin of safety using NRC sanctioned codes and standards.

DISCUSSION AND SIGNIFICANT HAZARDS CONSIDERATION
FOR SURVEILLANCE CAPSULE REMOVAL SCHEDULE

Table 3-7 (on page 3-27), the surveillance capsule removal schedule of the Technical Specifications, was revised to document the early withdrawal of surveillance capsule assembly W-265 and to document the installation of two replacement capsule assemblies; one at W-225 and one at W-265. The original W-265 capsule assembly was removed early, at 5.9 EFPY, to benchmark the end of a core loading design used up to that time and the two replacement capsule assemblies were installed to document the reduced fluence expected as a result of a core loading design change. The new core design initiated in the following cycle is expected to reduce the fluence at the inside surface of the reactor vessel by 34%.

Pursuant to 10 CFR 50.92, the following significant hazards considerations have been made:

- (1) Will the change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. Early removal of the W-265 capsule assembly and the installation of the two replacement capsule assemblies will not cause a significant increase in the probability or consequence of a previously evaluated accident, but instead will provide better information on the fluence to the inside surface of the reactor vessel. The surveillance capsule holders mounted in the reactor vessel were originally designed to allow the insertion of replacement capsule assemblies as required by 10 CFR 50, Appendix G. The two replacement capsule assemblies are of the same design, installation, and manufacture as the original capsule assemblies.

- (2) Will the change create the possibility of a new or different type of accident from any accident previously evaluated?

No. The replacement capsule assemblies will not create the possibility of a new or different kind of accident from any previously evaluated accident because they are of the same design, installation, and manufacture as the original capsule assemblies.

- (3) Will the change involve a significant reduction in a margin of safety?

No. There is no significant reduction in the margin of safety involved because the replacement capsule assemblies occupy the holders of the original capsule assemblies and are, therefore, in the same configuration as the original capsule assemblies and do not affect the operation of the plant.

JUSTIFICATION FOR FEE CLASSIFICATION

The proposed amendment is deemed to be Class III, within of 10 CFR 170.22, in that it involves a single safety co