



Omaha Public Power District

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

June 4, 1982
LIC-82-227

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:

Schedules for Completing Selected NUREG-0737 Tasks

The Commission's letter to the Omaha Public Power District, dated May 5, 1982, requested the District establish or reconfirm the completion schedules for several NUREG-0737 items which are scheduled to be implemented after March 1, 1982. Several items in the May 5, 1982 letter stated that no reply was needed and, accordingly, the District has not addressed these items. The District's schedule or confirmation of completion for the remaining items is attached.

Sincerely,

W. C. Jones
Division Manager
Production Operations

Attachments

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

A046
s/
111

Attachment 1

STATUS OF NUREG-0737 TASKS FOR THE FORT CALHOUN STATION

<u>Item</u>	<u>Title</u>	<u>Requirement</u>	<u>Status</u>
I.A.1.3.1	Limit Overtime	Revise administrative procedures to limit overtime in accordance with NRC Policy Statement issued by Generic Letter 82-02, dated February 8, 1982.	The District intends to comply with the revised overtime guidelines for shift operations personnel, shift health physicists, and for key maintenance personnel by October 1, 1982.
I.A.1.3.2	Minimum Shift Crew	Augment current shift staffing to conform with minimum levels set forth on page 3-9 of NUREG-0737.	The District intends to comply with the minimum staffing requirements for operations personnel by July 1, 1982. A Technical Specification change will be submitted to the Commission to reflect this operations staffing upgrade.
I.C.1	Revise Emergency Procedures	Revise procedures by first refueling outage after October 1, 1982.	The District intends to implement revised emergency procedures in accordance with the following discussion. The District's letter dated August 7, 1981 referenced the CEOG proposed emergency procedure guidelines submitted to the Commission for review and approval. This letter also detailed the District's understanding that the schedule for implementing these guidelines is the first refueling outage commencing six months after Commission approval. It should also be noted that the CEOG guidelines were modified (CEN-152, Rev. 1, Draft) and forwarded to the Commission by CE letter dated April 30, 1982.

Attachment 1
(Continued)

<u>Item</u>	<u>Title</u>	<u>Requirement</u>	<u>Status</u>
II.D.1.2	RV and SV Test Programs	Submit plant specific reports on relief and safety valve test programs.	Complete. See the District's letter dated April 1, 1982 (LIC-82-138).
II.D.1.3	Block Valve Test Program	Submit report of results of test program.	Complete. See the District's letter dated August 7, 1981.
II.K.3.30 & II.K.3.31	SB LOCA Analysis	Submit plant specific analyses.	The District's letter dated April 1, 1982 (LIC-82-144) references the CE0G report (CEN-203-P, Rev. 1-P) that addresses Item II.K.3.30. If a reanalysis or revision to the subject SB LOCA evaluation model is necessary, the District expects to submit the required plant specific analyses one year after Commission approval of the revised model.
III.A.1.2	Staffing Levels for Emergency Situations	Provide for augmentation of staffing in accordance with Generic Letter 81-10, dated February 18, 1981.	Complete. See the District's letter dated March 1, 1982. The District will meet the on-shift minimum staffing requirements by July 1, 1982 and the March 1, 1982 letter details the District's capabilities for emergency staff augmentation. The District considers this item closed.
III.A.1.2	Upgraded Emergency Support Facilities	Complete modifications.	See the District's letters dated April 2, 1981 and June 1, 1981 for schedule. Also, see Attachment 2 for updated information and schedule deviation justification

Attachment 1
(Continued)

<u>Item</u>	<u>Title</u>	<u>Requirement</u>	<u>Status</u>
III.A.2.2	Meteorological Data	Complete modifications.	Complete. See Attachment 3.
III.D.3.4	Control Room Habitability	Modify facility as identified by licensee study.	See the District's letters dated January 26, 1981 and August 7, 1981 for identifications of necessary modifications and schedule for completion.

Attachment 2

The District's Operations Support Center (OSC), located in the Shift Supervisor's office, is complete and functional. The construction of the permanent Technical Support Center (TSC) is complete and the District is presently proceeding with the movement of necessary equipment and supplies into the TSC. The permanent TSC will be functional for emergency situations, except as noted below, by October 1, 1982. The construction of the permanent Emergency Operations Facility (EOF) has commenced at the site of the North Omaha Power Station and construction is expected to be completed by November 1, 1982, at which time the permanent EOF will be operational and functional, except as noted below. This completion date for the permanent EOF building has been extended by one month due to construction delays caused by the extensive number of rain days during May, 1982. The interim on-site TSC and EOF will continue to be available for emergencies until the permanent facilities are declared operational.

The District's Emergency Response Facilities (ERF) computer and associated hardware, which will provide the technical, meteorological, and radiological data system for the TSC and EOF and provide the capability for integration of the safety parameter display system (SPDS), will be installed during the next Fort Calhoun Station refueling outage, with an expected operational date of June 1983. This schedule is justified because a cold shutdown of at least two months (i.e., refueling outage) is required to integrate the ERF computer with the existing plant instrumentation. The District's next refueling outage is scheduled to commence in December 1982 or January 1983. Allowing for three or four months for testing and start-up of the data systems after installation, the District expects to have the ERF's fully operational by June 1983. In the interim, the District believes the extensive communications capabilities between the control room and the TSC will be sufficient to provide the pertinent information flow required during an emergency situation.

Attachment 3

The District interprets the Commission's recommended schedule of October 1, 1982 for completing the Fort Calhoun Station meteorological modifications to correspond to the completion of Milestone 5 of Annex 1 to Appendix 2 of NUREG-0654. Based on this interpretation, the District presently has all of the necessary meteorological hardware and software installed in the Fort Calhoun Station meteorological tower (TRI-EX) and in the existing plant computer. The existing computer input and output parameters will be transferred to the Emergency Response Facilities (ERF) computer in accordance with the schedule detailed in Attachment 2 to this letter. Additionally, the District presently meets the intent of the three basic functions for meteorological compliance detailed in Appendix 2 to NUREG-0654. The first and second basic functions are fulfilled by the onsite meteorological tower and the existing plant computer and their associated hardware and software. The third meteorological basic function, regarding the capability for remote interrogation of meteorological information to onsite and offsite organizations, is presently fulfilled by the extensive communications system to the subject organizational facilities. The District believes this communications capability is sufficient for providing the pertinent information during emergency situations. The implementation of the ERF computer will enhance and expedite the transfer of information capability.