

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000

July 27, 1984
LIC-84-239

Mr. James R. Miller, 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. Miller:

NUREG-0737 Technical Specifications
(Generic Letter 83-37)

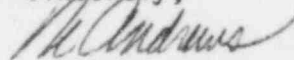
NUREG-0737, "Clarification of TMI Action Plan Requirements," identified certain items for which Technical Specifications would be required. Generic Letter 83-37, dated November 1, 1983, provided guidance concerning the scope of the specifications and samples in Standard Technical Specification format which the staff would find acceptable.

Accordingly, in a letter to the Commission dated March 27, 1984, the Omaha Public Power District provided discussion on the current Fort Calhoun Station Technical Specifications regarding the Fort Calhoun Station Auxiliary Feedwater System. We stated that, based on this discussion, we believed that no changes to our current specifications would be required.

Subsequently, the District received the Commission's Safety Evaluation Report (SER) dated June 15, 1984, on this topic. The Commission stated, with reference to Section 4.7.1.2.a.5, that this section is "not applicable." The District believes that this is indeed the correct conclusion. However, we believe our discussion on which this conclusion was based is in need of additional clarification.

Accordingly, please find attached additional discussion and information regarding Section 4.7.1.2.a.5 of the suggested Technical Specifications from Generic Letter 83-37. We believe that this will amplify our position that Section 4.7.1.2.a.5 is, indeed, not applicable and no changes to the Technical Specifications are necessary.

Sincerely,



R. L. Andrews
Division Manager
Nuclear Production

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Attachment

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

Mr. E. G. Tourigny, NRC Project Manager

Mr. L. A. Yandell, Senior Resident Inspector

Employment with Equal Opportunity
Male/Female

A046
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Attachment

Long Term Auxiliary Feedwater Technical Specification Evaluation (NUREG-0737, Section II.E.1)

Supplemental Information

Surveillance Requirements

Generic Letter 83-37, Enclosure 3, provides model Technical Specifications for the Auxiliary Feedwater System. Section 4.7.1.2.a.5 requires:

(*5. Providing a dedicated individual during surveillance testing who will be in communication with the control room. This individual shall be stationed near any (locally) manually realigned valves when only one auxiliary feedwater train is available.)

Fort Calhoun Station utilizes two (2) surveillance tests for the auxiliary feedwater system. The first is Surveillance Test ST-FW-3, F.2. This test is divided into two parts. The first places one auxiliary feedwater (AFW) channel in bypass at a time and no valves are manually realigned. If a valid auxiliary feedwater signal should occur during this portion of the test, the system would align itself automatically to feed the appropriate steam generator(s) with auxiliary feedwater.

The second part of this test places both the electric and turbine driven auxiliary feedwater pumps and the auxiliary feedwater isolation valves in "override" for one steam generator at a time. That is, if "A" Steam Generator were under test and a valid AFW initiation signal was received, the AFW system would respond normally for "B" Steam Generator. However, "A" Steam Generator would not be fed with AFW until the operator returned the overridden switches to their normal positions.

Because of the equipment arrangement at Fort Calhoun Station, an operator performs this portion of the test in conjunction with an Instrument and Control (I&C) technician. The operator is located in the control room at the AFW panels. This operator is also in communication with the I&C technician who is either located in the switchgear room or in the upper penetration room. A step has been added to ST-FW-3, F.2 to remind the operator to return the override switches to their normal positions in the event of a valid AFW initiation signal. No valves are (locally) manually realigned. Any valve repositioning or override is done from the control room.

The second applicable surveillance test is ST-FW-1, F.2. This test actuates both AFW pumps and AFW isolation valves from various locations in the plant. During any portion of this test, a valid AFW initiation signal would initiate auxiliary feedwater without requiring operator intervention.

* This is applicable only for plants with one auxiliary feedwater train available during surveillance. . ."