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LIC-92-201R

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, DC 20555

Reference: Docket 50-285

Gentlemen:

SUBJECT: Fort Calhoun Station Quality Assurance File Room

In accordance with 10 CFR 50.54(a)(3) Omaha Public Power District (OPPD) is submitting a clarification to a commitment concerning the qualifications of the Fort Calhoun Station Quality Assurance (QA) Records Storage Facility. This clarification could be interpreted as a reduction in a commitment, therefore, OPPD requests NRC approval prior to implementation.

IDENTIFICATION OF CHANGE

OPPD wishes to clarify a commitment to ANSI N45.2.9 - 1979 contained in Appendix A of the Updated Safety Analysis Report (USAR) related to the wind loading requirements for the Fort Calhoun Station Quality Assurance File Room. ANSI N45.2.9 - 1979 requires that the QA records facility be constructed in a manner which protects the QA records from "natural disasters such as winds." OPPD is proposing to revise Appendix A to clearly state the maximum wind velocity that the QA File Room is designed to withstand.

REASON FOR CHANGE

The QA File Room at Fort Calhoun Station currently is located within a Class I structure (Auxiliary Building) designed to withstand a tornado with a maximum wind velocity of 300 miles per hour (USAR Section 5.11.3.1). A new QA File Room has been constructed in the Administration Building at the Fort Calhoun Station which is not a Class I structure. As ANSI N45.2.9 - 1979 does not state the design requirements for natural disasters, OPPD is proposing to define the design maximum wind velocity for the QA File Room as 110 mph. Approval of the clarification will allow use of the new QA File Room in the Administration Building.

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BASIS FOR CONCLUSION THAT THE CHANGE SATISFIES PREVIOUS COMMITMENTS

The proposed change to Appendix A of the Updated Safety Analysis Report (USAR) will clarify that the QA File Room can withstand a maximum wind velocity of 110 mph.

The maximum wind velocity of 110 miles per hour was calculated for the new QA File Room based upon the Steel Deck Institute and Uniform Building Code criteria. As stated in USAR Section 5.4.6, the fastest wind at the site location for a 100 year period of occurrence is a 90 mph basic wind at 30 feet above ground level. Therefore, the new QA File Room is well within the design basis wind velocity requirements for the site location.

A QA File Room does not fulfill a safety related function and does not meet the criteria of Regulatory Guide 1.117, "Tornado Design Classification," as a structure required to withstand a tornado. Although the current QA File Room is located within a Class I structure capable of withstanding the effects of a tornado, it is OPPD's position that there are no requirements in ANSI N45.2.9 - 1979 for a QA File Room to withstand tornados.

Therefore, OPPD has concluded that the QA File Room will continue to meet the requirements of 10 CFR Part 50, Appendix B, Section XVII, on the storage of quality assurance records.

Attached is a proposed marked-up change to Appendix A of the USAR.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates
Division Manager
Nuclear Operations

WGG/sel

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Acting Project Manager

H. Standard: ANSI N45.2.6-1973, "Qualifications of Inspection Examination, and Testing Personnel for Nuclear Power Plants"

Regulatory Guide: RG 1.58, Revision 1, "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel"

Position: OPPD's QA Program and QA Plan comply with the applicable requirements of this standard and Regulatory Guide with the following alternatives or exceptions:

1. OPPD and contractor inspectors performing Quality Control inspections are certified in accordance with this standard; however, these certification requirements are not applied to personnel performing operational surveillance testing and inspection in accordance with the Technical Specifications, to investigative inspections or to the conduct of preliminary inspections for purpose of planning corrective or improvement actions, or to the surveillance of plant operations to verify compliance with procedures. Certification of inspectors for nondestructive examinations is accomplished in accordance with SNT-TC-1A guidelines.

I. Standard: ANSI N45.2.8-1975, "Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants"

Regulatory Guide: RG 1.116, Revision 0, "Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems"

Position: The applicable requirements of this standard and Regulatory Guide are implemented for modification activities which meet or exceed original plant specifications and manufacturer's recommendations, as described in the QA Plan.

J. Standard: ANSI N45.2.9-1974, "Requirements for Collection, Storage and Maintenance of Quality Assurance Records for Nuclear Power Plants"

Regulatory Guide: RG 1.88, Revision 2, "Collection, Storage, and Maintenance of Nuclear Power Quality Assurance Records"

Position: OPPD's QA Program and QA Plan comply with the applicable requirements of this standard and Regulatory Guide with the following alternatives or exceptions:

1. The Fort Calhoun Station File Room meets the criteria of NUREG-0800, Standard Review Plan, Part 17.1, Acceptance Criteria 17.4, Alternative (3); ANSI N45.2.9-1979; ~~and~~ NFPA 232; and will withstand a maximum wind velocity of 110 miles per hour.

2. Fire rated file cabinets used for interim record storage meet a one hour or greater fire rating.