



Omaha Public Power District  
444 South 16th Street Mall  
Omaha, Nebraska 68102-2247

September 29, 1998  
LIC-98-0125

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

- References:
1. Docket 50-285
  2. NRC Generic Letter 97-04, "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps," dated October 7, 1997
  3. Letter from OPPD (S.K. Gambhir) to NRC (Document Control Desk), dated December 31, 1997 (LIC-97-0189)

**Subject: Commitment to Request Revision of Licensing Basis for Net Positive Suction Head for Containment Spray and High Pressure Safety Injection Pumps in Recirculation Phase**

The Reference 3 letter provided the Omaha Public Power District response to NRC Generic Letter 97-04 (Reference 2). This response included a summary of the current Fort Calhoun Station (FCS) design basis for assuring sufficient net positive suction head (NPSH) for the containment spray and high pressure safety injection pumps in the recirculation phase. The current design basis (which credits 25% of the available containment overpressure) reflects notifications to the NRC and Updated Safety Analysis Report revisions made in 1992; however, no Safety Evaluation Report was ever requested by OPPD or issued by NRC.

The NRC staff review of this response has resulted in concerns that the crediting of containment overpressure to assure sufficient NPSH was never formally reviewed and approved by the NRC as part of the current FCS licensing/design bases. In order to resolve this concern, OPPD will submit an application for facility license change with appropriate supporting documentation by November 30, 1998, which will request NRC approval of credit for some containment overpressure in assuring sufficient NPSH during the recirculation phase for the applicable pumps.

Please contact me if you have any questions regarding this information.

Sincerely,

S.K. Gambhir  
Division Manager  
Nuclear Operations

9810060046 980929  
PDR ADOCK 03000285  
P PDR

1/0  
A076

U. S. Nuclear Regulatory Commission  
LIC-98-0125  
Page 2

TCM/tcm

c: E.W. Merschoff, NRC Regional Administrator, Region IV  
L.R. Wharton, NRC Project Manager  
W.C. Walker, NRC Senior Resident Inspector  
Winston and Strawn