

OPPD

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102-2247
402/536-4000

May 23, 1988
LIC-88-380

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

Reference: 1. Docket No. 50-285
2. Letter from OPPD (R. L. Andrews) to NRC (Document Control Desk) dated April 15, 1988 (LIC-88-291)

Gentlemen:

Enclosed is Omaha Public Power District's (OPPD) "Application for Amendment of Operating License" which seeks to amend Section 5 of the Technical Specifications as set forth in Appendix A to that license. This amendment application supersedes the application submitted in Reference 2.

OPPD respectfully requests 30 days from date of issuance in order to implement the revised specifications.

Sincerely,

for *R. L. Andrews*
R. L. Andrews
Division Manager
Nuclear Production

RLA/me

Enclosure

c: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Ave., N.W.
Washington, DC 20036

R. D. Martin, NRC Regional Administrator
A. Bournia, NRC Project Manager w/original markup
P. H. Harrell, NRC Senior Resident Inspector
Harold Borchert, Director - Nebraska Division of
Radiological Health

8806020067 880523
PDR ADOCK 05000285
P DCD

A00!
1/1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
Omaha Public Power District
(Fort Calhoun Station
Unit No. 1)

)
)
)
)
)

Docket No. 50-285

AFFIDAVIT

W. G. Gates, being duly sworn, hereby deposes and says that he is authorized to act as an alternate to the Division Manager - Nuclear Production of the Omaha Public Power District; that as such he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached information concerning the Application for Amendment dated May 18, 1988, concerning Section 5 of the Technical Specifications; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information, and belief.

W. G. Gates

W. G. Gates - authorized alternate to
Division Manager
Nuclear Production

STATE OF NEBRASKA)
) SS
COUNTY OF DOUGLAS)



Subscribed and sworn to before me, a Notary Public in and for the State of Nebraska on this 23rd day of May, 1988.

L. Patrick Walling
Notary Public

Justification and No Significant Hazards Consideration

These proposed changes to Appendix A of Operating License DPR-40 concern administrative controls. This proposed amendment would delete the organizational charts from Chapter 5 of the Fort Calhoun Station Technical Specifications. The NRC has approved a similar change for McGuire Nuclear Station, and Shearon Harris Nuclear Power Plant, Unit 1 (March 16, 1986 and January 27, 1988 respectively). Sections 5.5.1.2 and 5.5.2.2 contain the compositions of the Plant Review Committee (PRC) and Safety and Review Committee (SARC). These compositions would be revised to reflect changes in the organizational structure at OPPD. Also, position titles have been revised to reflect organizational changes.

The required content of the administrative controls sections of the Technical Specifications is specified in 10 CFR 50.36(c)(5). The regulation does not state that organizational charts must be included in the Technical Specifications. Moreover, this proposed change would only delete this information from the Technical Specifications, not from all licensing documents. Changes to this information in the USAR is presently controlled by the provisions of 10 CFR 50.59 and 10 CFR 50.71 and would remain under these provisions following the proposed changes.

Chapter 5 of the Fort Calhoun Station Technical Specifications would still contain the details of those administrative controls necessary to assure safe operation of the facility upon incorporation of the proposed changes. Revisions to this information result in the processing of unnecessary license amendments by both OPPD and the NRC. With the proposed changes, the NRC would be informed of changes through annual USAR updates as required by 10 CFR 50.71. These changes are intended to provide a more efficient resolution of administrative matters at Fort Calhoun Station.

Revisions are proposed for SARC and PRC membership. PRC membership will be expanded by one member. The positions of Supervisor - Technical, Supervisor - Instrument & Control and Electrical, and Plant Engineer have been deleted, and the Manager - Training, the Supervisor - System Engineering, and Plant Chemist have been added to the PRC in their place. Also, the Manager - Safety Review Group has been substituted for the Reactor Engineer. The Supervisor - Chemistry and Radiation Protection has been changed to the Supervisor - Radiation Protection, and the position of Manager - Quality Assurance and Quality Control has been added to the PRC. These changes will not degrade the function of the PRC and do not involve Significant Hazards Considerations.

The proposed changes to Technical Specification 5.4 are administrative in nature. As a result of changes made via Amendment 101, the functions of the Training Department were moved from the direct control of the Manager - Fort Calhoun, to under the control of the Manager - Administrative and Training Services. This title becomes Manager - Training upon implementation and is designated as such. Therefore, Specification 5.4.1 and 5.4.2 have been altered to incorporate this change.

With the recent NRC amendment to 10 CFR Part 55, Appendix A to Part 55 no longer exists. Specification 5.4.1 has been changed to accommodate this.

No Significant Hazards Considerations

The proposed changes do not involve significant hazards based on the following information:

Attachment (Continued)

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

No. The proposed changes do not involve a physical modification of equipment or a change in operational methods. The proposed changes do not alter any inputs or methodologies utilized in safety analyses for Fort Calhoun Station. Organizational information will continue to be maintained in the USAR and the NRC will be informed of changes through the annual USAR update.

Will the change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed changes do not involve a physical modification of equipment or a change in operational methods. The proposed changes do not alter any inputs or methodologies utilized in safety analyses for Fort Calhoun Station. Organization information will continue to be maintained in the Fort Calhoun Station USAR.

Will the change involve a significant reduction in a margin of safety?

No. The proposed changes do not in any way alter OPPD's commitment to maintain a management structure that contributes to the safe operation and maintenance of Fort Calhoun Station. This information will be maintained in the USAR, clearly communicating the lines of authority and responsibility for station operations.

For the stated reasons, Omaha Public Power District does not believe the proposed changes to the Technical Specifications involve any significant hazards.