



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

May 26, 1999

LIC-99-0045

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station P-13  
Washington, DC 20555

- References:
1. Docket No. 50-285
  2. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated January 30, 1998 (LIC-98-0013)
  3. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated January 30, 1998 (LIC-98-0009)
  4. Combustion Engineering Owners Group (CEOG) Task 942, "Development of a RCS Pressure and Temperature Limits Report for the Removal of P-T Limits and LTOP Requirements from the Technical Specifications," CE NPSD-683
  5. Draft Regulatory Guide-1053, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence," June 1996
  6. WCAP-14040-NP-A, Revision 1 (Section 2.2, Neutron Fluence Calculations), "Methodology to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves," (TAC# M91749), January 1996
  7. Generic Letter (GL) 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," dated January 31, 1996
  8. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated June 1, 1992 (LIC-92-157A)

SUBJECT: Application for Amendment of Operating License

As a Combustion Engineering Owners Group (CEOG) lead plant submittal, the Omaha Public Power District (OPPD) submits this "Application for Amendment of Operating License" to revise the Fort Calhoun Station (FCS) Unit No. 1 Technical Specifications (TS). To facilitate review, this submittal supersedes OPPD's previous similar application (Reference 2), primarily as a result of comments from and discussions with the NRC staff regarding the contents and structure of Revision 2 of CEOG Topical Report CE NPSD-683 (Reference 4). OPPD proposes to relocate the pressure-temperature curves, the predicted NDTT shift curve, and the low temperature overpressure protection (LTOP) limits and values from the FCS TS to an OPPD controlled document entitled "RCS Pressure-Temperature Limits Report (PTLR)," consistent with the guidance of Reference 7.

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Section 1 of CE NPSD-683, Revision 3 (enclosed) contains an overview and description of the neutron fluence analysis methodology. A detailed description of the neutron fluence analysis methodology used by Westinghouse for FCS and the analysis results were submitted in Attachment C of Reference 3. Reference 3 was an "Application for Amendment of Operating License," which proposed the deletion of Section 3.E (since revised to Section 3.D by Amendment 184) associated with monitoring the long term load factor and evaluation of fluence. The neutron fluence analysis was performed by Westinghouse, in accordance with Reference 5, using the methods of WCAP-14040-NP-A, Revision 1 and the ENDF/B-VI Cross-Section Library. Attachment C of Reference 3 should be used to assist in the review of Section 1 of CE NPSD-683. The methodology employed in Attachment C of Reference 3 has been approved by the NRC as documented in the Safety Evaluation Report contained in Reference 6.

To accommodate the revision of CE NPSD-683 from Revision 2 to Revision 3, several of the FCS TS pages submitted in Attachment A of Reference 2 (pages 2-4, 2-7a, and 5-17b) were revised to specify the latest approved revision of CE NPSD-683. This eliminates the need to revise the FCS TS again if CE NPSD-683 should be revised in the future. The Basis of TS 2.3 (page 2-22) was revised to delete statements concerning startup of the reactor by running the reactor coolant pumps as these statements are contained in the PTLR. Where applicable, FCS TS pages were revised from the Reference 2 submittal to reflect the issuance of subsequent amendments.

The "Discussion, Justification and No Significant Hazards Consideration" of Reference 2 was revised to: (1) remove reference to a specific revision number of CE NPSD-683; (2) note that the neutron fluence analysis methodology is described in Attachment C of Reference 3; (3) note the relocation of the TS 2.3 Basis statements to the PTLR as mentioned above; and (4) reference the analysis performed for FCS by ABB-CE for P-T limits and LTOP system requirements for continued operation through 20 effective full power years. This ABB-CE analysis was the basis for OPPD's amendment request of Reference 8, which resulted in the issuance of Amendment 161.

In addition, several changes were made to the PTLR submitted as Attachment C of Reference 2, consistent with the revisions to CE NPSD-683 and the above discussion. A reference to WCAP-14040-NP-A, Revision 1 was added, which required the renumbering of references throughout the text. Use of the latest approved revision of CE NPSD-683 was referenced. A note was added to Figure 4.1 concerning startup of the first reactor coolant pump (RCP), specifically that no heatup or cooldown limit violations will occur during startup of the first RCP, which is a routine plant evolution. The remaining changes are editorial in nature.

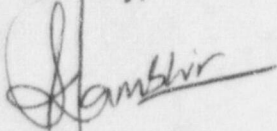
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Attachment A contains a markup reflecting the requested changes to the Technical Specifications. Attachment B contains the revised "Discussion, Justification and No Significant Hazards Consideration." Attachment C contains the revised PTLR.

OPPD respectfully requests NRC approval by September 1, 1999, with a 60-day implementation period.

If you have additional questions or require further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "S. K. Gambhir", with a stylized flourish extending from the end.

S. K. Gambhir  
Division Manager  
Nuclear Operations

SKG/mle

Attachments  
Enclosure

c: E. W. Merschoff, NRC Regional Administrator, Region IV  
L. R. Wharton, NRC Project Manager  
W. C. Walker, NRC Senior Resident Inspector  
B. E. Casari, Director - Environmental Health Division,  
State of Nebraska  
Winston & Strawn



