

**Omaha Public Power District**  
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October 28, 1988  
LIC-88-969

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

Reference: Docket No. 50-285

Gentlemen:

SUBJECT: Technical Specification Waiver Concerning Sampling of the Reactor  
Coolant System During Core Off-load Condition

Omaha Public Power District (OPPD) respectfully requests a waiver of compliance from the provisions of Technical Specification 3.2 relative to Table 3-4, Minimum Frequencies for Sampling Tests. The waiver is tentatively requested beginning November 2, 1988 for the duration of the outage (when the reactor coolant system is drained) based on the following:

Table 3-4 of the Technical Specifications requires reactor coolant sampling and analysis during the following conditions: a: Power Operation, b: Hot Standby and Hot Shutdown, c: Cold Shutdown, and d: Refueling Operation. Subsequent to off-loading the core and draining down the reactor coolant system, there remains no reactor coolant in the system to sample. Requirements generally observed are one sample for chloride and boron concentration per every three days during refueling shutdown although a strict Technical Specification interpretation would not require this except during the actual movement of fuel. The reactor coolant system level will be lowered such that there will no longer be coolant available to be sampled.

If OPPD did obtain a sample and analyzed it for chloride, the worst case would be that the chloride would be out of specification. If the chloride was out of specification, the Limiting Condition for Operation would be invoked. The LCO would then require that the plant be placed in cold shutdown. However, the plant is already in cold shutdown. It must also be pointed out that to take a sample at this point would require manually lowering a container into the cavity, probably from the refueling machine. Dose rates will be high and the possibility of dropping the object exists.

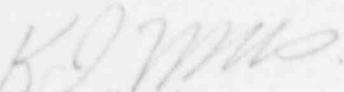
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The configuration of the Fort Calhoun Station Reactor Coolant System will be such that none of the mode designations of Table 3-4 apply. The system is not technically in a cold shutdown but rather is in refueling shutdown. There will not be any fuel in the reactor; therefore, the refueling operation (not refueling shutdown) mode does not apply. If OPPD were to choose the mode which most closely represents the configuration, one could assume that the cold shutdown mode (rather than the refueling mode) would apply. By Table 3-4, OPPD would then be required to take one sample per three days and analyze for chloride. The upcoming configuration of the core will not be conducive to taking samples, so the most conservative approach will be to assume that chlorides are out of specification. If chlorides are assumed to be out of specification, following the Limiting Condition for Operation, the requirements are to place the reactor in a cold shutdown condition. Therefore, no additional action is needed, as we are already shutdown. If OPPD calls the mode refueling shutdown, and follow the same train of logic, there are no LCO requirements for chloride during refueling. The LCO for boron during refueling shutdown only applies to refueling operations. If boron is out of specification, refueling operation must cease until it is returned to specification. Since there is no fuel in the reactor, suspending the movement of fuel in the reactor is not possible.

The sampling specification is not necessary and therefore the waiver should be granted. Additionally, a request for Amendment to clarify this situation will be processed prior to the 1990 refueling. If you should have any questions, please feel free to call.

Sincerely,



K.J. Morris  
Division Manager  
Nuclear Operations

KJM/sa

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