



Omaha Public Power District
444 South 18th Street Mall
Omaha, Nebraska 68102-2247

March 12, 1999

LIC-99-0022

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

References: 1. Docket No. 50-285
2. LIC-98-0123 to NRC (Document Control Desk) from OPPD (W.G. Gates) dated September 28, 1998

SUBJECT: Response to Request for Additional Information to the "Application for Resolution of an Unreviewed Safety Question and Amendment of Operating License" (TAC No. MA3400)

Omaha Public Power District (OPPD) in Reference 2 submitted the "Application for Resolution of an Unreviewed Safety Question and Amendment of Operating License." This amendment request proposes to install capability for override of the Containment Isolation Actuation Signal (CIAS) which closes the containment isolation valves for Reactor Coolant System (RCS) letdown flow.

In a telephone conversation on February 24, 1999, the NRC staff requested that the proposed wording of the Updated Safety Analysis Report (USAR) Section 9.2.5 included in Reference 2 be revised to indicate that the use of the letdown system following a transient or an accident to reduce excessive RCS inventory is not credited in Section 14 safety analyses of the USAR.

OPPD agrees with the NRC request and encloses revisions of the appropriate pages from Reference 2. Please replace the markup page of Section 9.2.5 of the USAR and the markup page of Appendix B of the Facility Operating License No. DPR-40 previously submitted with the new markup pages.

If you require further information, please contact me or members of my staff.

Sincerely,

S. K. Gambhir
Division Manager
Nuclear Operations

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Acc'd

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LIC-99-0022

Page 2

Attachments

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

APPENDIX B

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. DPR-40

Omaha Public Power District shall comply with the following conditions on the schedules noted below:

<u>Amendment Number</u>	<u>Additional Condition</u>	<u>Implementation Date</u>
181	The licensee is authorized to relocate certain technical specification requirements to licensee-controlled documents. Implementation of this amendment shall include the relocation of these technical specification requirements to the appropriate documents, as described in the licensee's application dated November 20, 1996, as supplemented by letters dated February 20, 1997, and March 25, 1997, and evaluated in the staff's safety evaluation dated March 27, 1997.	The amendment shall be implemented as of its date of issuance.
[To be assigned]	This amendment authorizes the licensee to incorporate in the Updated Safety Analysis Report (USAR) changes to the description of the facility allowing the installation of capability for override of the Containment Isolation Actuation Signal (CIAS) closure signal to the reactor coolant system letdown flow containment isolation valves. Implementation of this amendment is the incorporation of these changes as described in the licensee's application dated September 28, 1998, as supplemented by letter dated March 12, 1999, and evaluated in the staff's safety evaluation dated [to be assigned].	The amendment shall be implemented as of its date of issuance.

During cooldown, the operator uses the letdown control valves and/or the charging pumps to adjust and maintain the level of water in the pressurizer. Makeup water is introduced at the shutdown boric acid concentration. The operator may switch the suction of the charging pumps to the safety injection and refueling water tank (SIRWT). The charging flow may be used as an auxiliary spray to cool the pressurizer when less than three reactor coolant pumps are in operation. This is required because minimal RCP spray flow is available with less than three RCPs in operation.

9.2.4.4 Hot Leg Injection

Long term response to a large break Loss of Coolant Accident (LOCA) requires that, in order to prevent boron precipitation in the core, simultaneous hot and cold leg injection must be initiated. The CVCS system provides a path for hot leg injection in post-LOCA long term cooling. (Ref. 9.2-5).

9.2.5 Design Evaluation

Under emergency conditions, the charging pumps are used to inject concentrated boric acid into the reactor coolant system. Either PPLS, CPHS or pressurizer level control automatically starts all charging pumps. Because this function is not credited in the USAR Section 14 safety analyses these pumps are not considered Engineered Safeguards equipment. The SIAS also transfers the charging pump suction from the volume control tank to the discharge of the boric acid pump. If the boric acid pumps are not operable, boric acid flows by gravity from the concentrated boric acid tank to the charging pump suction header. If the charging line inside the reactor containment building is inoperative, the line may be isolated outside of the reactor containment and concentrated boric acid solution may be injected by the charging pumps through the safety injection system. Containment integrity is maintained during post LOCA situations by maintaining a higher pressure in the charging line than the containment atmospheric pressure.

A CIAS terminates letdown flow by closing two containment isolation valves. During an uncontrolled heat extraction event, the CIAS to the letdown flow isolation valves may be manually overridden in order to reduce excessive RCS inventory. In this situation, it is required that HPSI stop and throttle criteria (as defined in Emergency Operating Procedures) be met prior to overriding CIAS. This use of the letdown system is not credited in the Section 14 safety analyses.