



November 29, 1999
LIC-99-0114

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

- References:
1. Docket No. 50-285
 2. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated October 26, 1998 (LIC-98-0133)
 3. NUREG-0800, SRP 6.5.2, "Containment Spray as a Fission Product Cleanup System," Rev. 2, December 1988
 4. Draft Guide DG-1081, "Alternative Radiological Source Terms for Evaluating the Radiological Consequences of Design Basis Accidents at Boiling and Pressurized Water Reactors"
 5. NRC Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999
 6. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated August 2, 1999 (LIC-99-0068)
 7. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated October 8, 1999 (LIC-99-0091)

SUBJECT: Generic Letter 99-02 Detailed Project Plan

In Reference 6, Omaha Public Power District (OPPD) provided a response to the Requested Actions outlined in the Reference 5 Generic Letter (GL). This response for Fort Calhoun Station (FCS) included an alternate course of action and its basis, the schedule for submitting the detailed project plan to implement the proposed course of action for NRC staff review, and the basis for continued operability of affected systems. This letter provides the detailed GL 99-02 project plan to address required maintenance and testing of each applicable activated charcoal unit at FCS and the schedule for submitting any required license amendment requests.

As shown in Attachment 1, the detailed project plan is divided into two activities. The first activity is revising the FCS accident-based radiological consequence analyses as part of a comprehensive radiological consequences upgrade program. The upgrade program was described in Licensee Event Report 1998-013 (Reference 2) and at a meeting with the NRC staff on January 14, 1999.

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The analyses will incorporate three primary changes to the current FCS design basis:

1. Remove credit for the Containment Air Cooling and Filtering Charcoal Filters (VA-6A/B)
2. Take credit for the Containment Spray System as a fission product cleanup system in accordance with SRP 6.5.2 (Reference 3)
3. Model 100 scfm of Control Room unfiltered in-leakage for applicable accidents. This analyzed in-leakage may change as a result of the tracer gas test results.

OPPD is also continuing to evaluate use of the alternate source term in accordance with DG-1081 in these analyses. OPPD plans completion of these analyses by September 1, 2000.

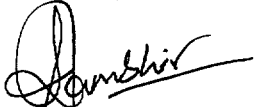
The second activity is preparing, internally processing, and submitting the required license amendment application to support the revised radiological consequence analyses and GL 99-02 compliance. It is anticipated that the revised analyses, while maintaining acceptable results, may represent increases to certain radiological consequences currently reported in the USAR, thus requiring NRC approval of Unreviewed Safety Questions. OPPD plans to submit the license amendment application associated with the revised analyses by October 27, 2000. The license amendment application will include revised Technical Specifications which specify the test efficiency and use of the ASTM D3803-1989 protocol for credited charcoal filters.

Until NRC approval of the associated license amendment, maintenance and testing of activated charcoal units at FCS will continue to be conducted in accordance with the requirements and methodologies specified in applicable Technical Specifications. Justification for continued operability of affected charcoal systems was provided in OPPD's Supplemental Response to Generic Letter 99-02 (Reference 7). The Control Room charcoal filter units have been tested utilizing the method prescribed in ASTM D3803-1989. Measured efficiencies from these tests demonstrate compliance with Technical Specifications efficiency requirements.

OPPD will continue to hold periodic meetings with the NRC to discuss the progress of this effort.

Please contact me if you have any questions.

Sincerely,



S. K. Gambhir
Division Manager
Nuclear Operations

CBS/tcm

Attachment

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

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ATTACHMENT 1

Generic Letter 99-02 Project Plan Activity Schedule

Task	Completion Date
Revise Radiological Consequence Analyses	September 1, 2000
Radiological Source Term Calculations (core inventory, RCS activity concentrations, secondary coolant design and Tech Spec source terms, iodine spike source terms) (3 calcs) (Complete)	
Containment Spray Coverage and Containment Mixing Calculations (2 calcs) (Complete)	
Complete testing and calculation of actual unfiltered leakage into Control Room envelope	
Revise Iodine Removal Coefficient Calculations in accordance with DG-1081 (3 calcs)	
Atmospheric Dispersion Factor Calculations (3 calcs) (Complete)	
GDT / Liquid Waste Source Terms (2 calcs) (Complete)	
LOCA/ Hydrogen Purge (7 calcs)	
MSLB, SGTR, Seized Rotor (3 calcs)	
FHAs / RV Head Drop (2 calcs)	
CEA Ejection / GDT / Liquid Waste Release (3 calcs)	
Final Calculation Package (28 calcs)	
License Amendment Requests	October 27, 2000
Prepare and Internally Process License Amendment Application to Support Revised Radiological Consequence Analyses and GL 99-02 Compliance	
Submit License Amendment Application for NRC Review and Approval	