

**From:** "JAWORSKI, RICHARD L" <rjaworski@oppd.com>  
**To:** "Alan Wang" <ABW@nrc.gov>  
**Date:** 3/5/02 3:59PM  
**Subject:** RE: Acceptance of Proposed Footnote to Containment Closures LAR

Alan,

The proposed change to Tech Spec 2.8.2(1) is acceptable to OPPD. The attachment reflects my understanding of the proposed change.

<<Proposed NRR LAR II.doc>>

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> -----Original Message-----

> From: Alan Wang [SMTP:ABW@nrc.gov]  
> Sent: Tuesday, March 05, 2002 9:49 AM  
> To: JAWORSKI, RICHARD L  
> Subject: Re: Acceptance of Proposed Footnote to Containment  
> ClosuresLAR  
>  
> Rich, this is the wrong TS. The TS is 2.8.2(1). TS 2.8.2(2) can  
> remain as is as far as we are concerned. As discussed this will not  
> work for 2.8.2(1) because if you make these changes you also need to  
> change the equipment hatch wording. What I proposed yesterday was add  
> a footnote to the applicability of 2.8.2(1) stating that:

>  
> \*The core must be subcritical for at least 72 hours before core  
> alteration and refueling operations are allowed."

>  
> The reviewer has told he would accept this. He wants it clearly  
> stated in the TS that fuel cannot be moved for 72 hours. That is his  
> main issue with the current wording. You can use the "recently  
> irradiated fuel " in 2.8.2(1) but that requires that the equipment  
> hatch wording revert to the current TS. If you have any questions  
> call me. Alan

>  
> >>> "JAWORSKI, RICHARD L" <rjaworski@oppd.com> 03/05/02 09:27AM >>>

> Alan,

>  
> The attachment contains my understanding of the proposed footnote for  
> TS

> 2.8.3(3). If this is what is proposed, it is acceptable to OPPD.

> Note

> again, this is still more liberal than our proposed amendment. We  
> would  
> not handle fuel this soon.

>  
> <<Proposed NRR LAR Changes.doc>>

>

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<mfrans@oppd.com>, "CAVANAUGH, GARY R" <gcavanaugh@oppd.com>

**Revised NRR Proposed Text  
for TSTF Issue      TECHNICAL SPECIFICATIONS**

**2.0 LIMITING CONDITIONS FOR OPERATION**

**2.8 Refueling**

**2.8.2 Refueling Operations – Containment**

**2.8.2(1) Containment Penetrations**

**Applicability\***

Applies to containment penetrations in MODE 5 during CORE ALTERATIONS and REFUELING OPERATIONS inside containment.

\*The core must be sub-critical for at least 72 hours before core alteration and refueling operations are allowed.

**Objective**

To minimize the consequences of an accident occurring during CORE ALTERATIONS and REFUELING OPERATIONS inside containment that could affect public health and safety.

**Specification**

The containment penetrations shall be in the following status:

- a. The Equipment Hatch Enclosure (Room 66) doors or the equipment hatch shall be capable of being closed;
- b. One door in the Personnel Air Lock shall be capable of being closed; and
- c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere either:
  1. closed by a manual or automatic isolation valve, blind flange, or equivalent, or
  2. capable of being closed.

Note - Penetration flow path(s) providing direct access from the containment atmosphere to the outside atmosphere may be unisolated under administrative controls.

**Required Actions**

- (I) With one or more containment penetrations not in required status, suspend CORE ALTERATIONS and REFUELING OPERATIONS within containment immediately.