

October 3, 2005

Mr. R. T. Ridenoure  
Vice President - Chief Nuclear Officer  
Omaha Public Power District  
Fort Calhoun Station FC-2-4 Adm.  
Post Office Box 550  
Fort Calhoun, NE 68023-0550

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 - ISSUANCE OF AMENDMENT RE:  
(TAC NO. MC6652)

Dear Mr. Ridenoure:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 236 to Renewed Facility Operating License No. DPR-40 for the Fort Calhoun Station, Unit No. 1. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated November 23, 2004, as supplemented by letter dated July 8, 2005.

The amendment (1) revises the descriptive wording of TSs Table 1-1, "RPS [reactor protection system] Limiting Safety System Settings," for the reactor trip setpoint for low steam generator water level to relocate unnecessary detail, and (2) converts TSs Section 4.0, "Design Features," to the format and content of NUREG-1432, Revision 3, "Standard Technical Specifications for Combustion Engineering Plants."

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

**/RA/**

Alan B. Wang, Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosures: 1. Amendment No. 236 to DPR-40  
2. Safety Evaluation

cc w/encls: See next page

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**NRR-100**

**ACCESSION NO.: ML051680267**

**PKG.: ML052850414**

**NRR-058**

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OMAHA PUBLIC POWER DISTRICT

DOCKET NO. 50-285

FORT CALHOUN STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 236  
License No. DPR-40

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Omaha Public Power District (the licensee) dated November 23, 2004, as supplemented by letter dated July 8, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, Renewed Facility Operating License No. DPR-40 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B. of Facility Operating License No. DPR-40 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 236, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

**/RA/**

Daniel S. Collins, Acting Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: October 3, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 236

RENEWED FACILITY OPERATING LICENSE NO. DPR-40

DOCKET NO. 50-285

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

REMOVE

TOC - Page 2  
TOC - Page 3  
4.0 - Page 1  
4.0 - Page 2  
4.0 - Page 3  
4.0 - Page 4  
4.0 - Page 5  
1.0 - Page 11

INSERT

TOC - Page 2  
TOC - Page 3  
4.0 - Page 1  
4.0 - Page 2  
4.0 - Page 3  
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1.0 - Page 11

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 236 TO RENEWED FACILITY

OPERATING LICENSE NO. DPR-40

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

1.0 INTRODUCTION

By application dated November 23, 2004, as supplemented by letter dated July 8, 2005 (Agencywide Documents Access Management System Accession No. ML043290062 and No. ML051920034, respectively), Omaha Public Power District (OPPD) requested changes to the Technical Specifications (Appendix A to Renewed Facility Operating License No. DPR-40) for the Fort Calhoun Station, Unit No. 1 (FCS). The supplement dated July 8, 2005, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published in the Federal Register on May 24, 2005 (70 FR 29798).

The proposed amendment will revise the descriptive wording of Technical Specifications (TSs) Table 1-1, "RPS [reactor protection system] Limiting Safety System Settings," for the reactor trip setpoint for low steam generator water level to relocate unnecessary detail, and converts TS Section 4.0, "Design Features," to the content of NUREG-1432, Revision 3, "Standard Technical Specifications Combustion Engineering Plants." These changes will be needed to support operation of FCS after major components (steam generators, a pressurizer, and a reactor vessel head) are replaced in 2006.

2.0 REGULATORY EVALUATION

In Section 50.36, "Technical specifications," to Title 10 of the *Code of Federal Regulations* (10 CFR), the Commission established its regulatory requirements related to the content of TSs. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and mitigation of accident consequences. The Commission noted that applicants were expected to incorporate into their TSs "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." [Statement of Consideration, "Technical Specification for Facility Licenses; Safety Analysis Reports," 33 FR 18610 (December 17, 1968).] Pursuant to 10 CFR 50.36, TSs are required to include items in the following five categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance

requirements; (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TSs.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement gave guidance for evaluating the required scope of the TSs and defined the guidance criteria to be used in determining which of the LCOs and associated surveillances should remain in the TSs. The Final Policy Statement established four criteria to define the scope of equipment and parameters to be included in the TSs. These criteria were developed for licenses authorizing operation and focused on instrumentation to detect degradation of the reactor coolant system pressure boundary and on equipment or process variables that affect the integrity of fission product barriers during design-basis accidents or transients. The fourth criterion refers to the use of operating experience and probabilistic risk assessment to identify and include in the TS, structures, systems, and components shown to be significant to public health and safety. Nevertheless, these criteria, codified by 10 CFR 50.36, are the source of the TS requirements for facilities licensed under 10 CFR Part 50. A general discussion of these considerations is provided below:

The regulations contained in 10 CFR 50.36, "Technical specifications," require that LCOs must be established for each item meeting one or more of the following criteria:

- (1) Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
- (2) Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- (3) Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of the fission product barrier.
- (4) Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

If a system, structure, or component does not meet any of the above criteria, it need not be included in the TSs.

For the changes listed in Table 1: "Less Restrictive Requirement – Removal of Detail," OPPD has stated that this specific technical information does not meet the criteria of 10 CFR 50.36 for inclusion in the TS and has proposed to move this information to the updated safety analysis report (USAR) under the guidance of 50.59. Changes listed in Table 2: "Administrative Changes," meet the Commission's guidance example concerning the application of the standards for determining whether a significant hazards consideration exists. The "Description

of Changes and Justification,” for the proposed administrative changes cites the appropriate Nuclear Regulatory Commission (NRC) provided example. The proposed changes are administrative in nature and move information from the TSs and present the same or equivalent information in the USAR. This change in information location does not change or affect commitments to FCS design criteria presented in the FCS USAR, Appendix G, the USAR accident analyses, approved methodologies, Regulatory Guides, or NUREGs.

In addition, the design of the facility is required by 10 CFR 50.34 to be described in the USAR. The quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 also require that the plant design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA plan (referenced in the USAR). Controls are specified in 10 CFR 50.59 for changing the facility as described in the USAR. Therefore, these details of system design now in the USAR will be adequately controlled.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Deletion of Extra Setpoint Description from Item 3 of TSs Table 1-1, “RPS Limiting Safety System Settings”

The existing trip setpoint description for Item 3, “Low Steam Generator Water Level Reactor Trip,” contains a parenthetical descriptive phrase below the main setpoint description “31.2% of Scale.” The parenthetical phrase is “(Top of feedwater ring: 4’10” below normal water level).” The specific dimension for the distance between the feedwater ring and normal water level is a historical carryover from the initial 1972 TSs, which define the steam generator level water inventory that is sufficient “to provide a twelve minute margin before the auxiliary feedwater is required” as stated in the existing TS 1.3(5) Bases section. Because the value/dimension for the normal water level to feedwater ring distance does not meet criteria set forth in 10 CFR 50.36, nor is the dimension utilized in Standard Technical Specifications (STS), the proposed relocation of the parenthetical statement to the USAR is acceptable.

#### 3.2 Conversion of Technical Specifications Section 4.0, Design Features, to Content of NUREG-1432, Revision 3, “Standard Technical Specifications for Combustion Engineering Plants”

The existing TS Section 4.0, “Design Features,” format and content is being changed to be identical to the Design Features content of NUREG-1432, Revision 3, “Standard Technical Specifications for Combustion Engineering Plants.” Conversion to the STS will include addition of standardized descriptions of the new and spent fuel storage facilities, and removal of descriptions of the containment, reactor coolant system, reactor core and control, emergency core cooling, and seismic design for Class I systems. An evaluation of each of the less restrictive requirements for removal of detail (Table 1) and administrative changes (Table 2), tabulated in Attachment 1, concludes that these changes are administrative in nature because they relocate information which does not meet the criteria in 10 CFR 50.36 or are deviations from the STS wording but not content because of plant-specific design or features. The NRC staff has compared the proposed TS Section 4.0 to the STS and agrees they are identical, except for the deviations noted in Table 2. The staff review of the licensee’s analysis for the relocation of information currently in the TS, but not provided for in the STS, to the USAR and the basis for deviations from the STS are discussed below.

##### 3.2.1 Table 1: Less Restrictive Requirements - Removal of Detail



Table 1 (attached) lists 12 items, including item 3.1 (above), that the licensee has proposed to relocate to the USAR. Table 1 also describes the descriptive information to be relocated to the USAR. The licensee has concluded that the 12 items in Table 1 do not meet the criteria set forth in 10 CFR 50.36(c)(2)(ii) for inclusion in the TS. Since this descriptive information is not required to be in the TS to provide adequate protection of the public health and safety, the staff concludes that this descriptive information may be relocated to a licensee-controlled document. Any changes to the FCS USAR are controlled by the provisions of 10 CFR 50.59 and would require staff review and approval if the change did not meet the criteria set forth in 10 CFR 50.59. Therefore, these details of system design relocated to the USAR will be adequately controlled.

### 3.2.2 Table 2: Administrative Changes to STS

The licensee has requested deviations from the STS wording because of plant-specific design or features. The NRC staff review of these deviations is discussed below.

#### 3.2.2.1 TS Sections 4.3.1.1.c and 4.3.1.1.d

FCS TSs Sections 4.3.1.1.c and 4.3.1.1.d are revised from the STS to include "Region 2" and "Region 1," respectively, to assure that the nomenclature of the high and low density fuel storage racks is consistent with the nomenclature presented on existing FCS TS Figure 2-10. The NRC staff verified that "Region 1" and "Region 2" correspond to low and high density fuel racks and provide consistency with the current TS. The staff agrees that this change is editorial in nature and is acceptable.

#### 3.2.2.2 TS Section 4.3.1.1.e

FCS proposed TS 4.3.1.1.e deviates from the STS 4.3.1.1.e wording as follows: 1) "acceptable range" is changed to "acceptable domain," 2) "Figure [3.7.18.1]" is changed to "Figure 2-10 for Region 2 Unrestricted," 3) "[either]" is replaced with "any of the Region 2," and 4) after "storage rack(s)," "in compliance with Reference (1)" is added. The proposed changes: 1) specify where the spent fuel falling within this burnup domain will be stored, 2) incorporate the reference prescribing the storage requirement, and 3) modify the STS wording to be consistent with the terminology of existing TS Figure 2-10. The word "range" has been revised to "domain" to be consistent with the wording used in existing FCS TS Figure 2-10. The NRC staff agrees that in this context the word "domain" meets the intent of the TS using the word "range." The current TS Section 2.8.3(1), "Spent Fuel Assembly Storage" was approved in Amendment 174. The staff has verified that the proposed changes are consistent with the plant-specific requirements in the current TS Section 2.8.3(1), "Spent Fuel Assembly Storage." The staff agrees that this change is editorial in nature and is acceptable.

#### 3.2.2.3 TS Section 4.3.1.1.f

FCS TS 4.3.1.1.f is added based on revisions to the TS 4.3.1.1.e STS wording as follows: 1) it deletes "New or," 2) it begins the specification with "Partially," 3) it replaces "the acceptable range" with "between the acceptable domain" and "Peripheral Cells," 4) it replaces "Figure [3.7.18-1]" with "Figure 2-10," 5) it replaces "[either]" with "peripheral cells of Region 2 storage," and 6) after "storage rack(s)" "in compliance with Reference (1)" is added.

The proposed changes: 1) specify where the spent fuel falling within this burnup domain will be stored, 2) incorporate the reference prescribing the storage requirement, and 3) modify the STS wording to be consistent with the terminology of existing TS Figure 2-10. The word “range” has been revised to “domain” to be consistent with the wording used in existing FCS TS Figure 2-10. The NRC staff agrees that in this context the word “domain” meets the intent of the TS using the word “range.” The current TS Section 2.8.3(1), “Spent Fuel Assembly Storage,” was approved in Amendment 174 (Reference 1 of above). The staff has verified that the proposed changes are consistent with the plant-specific requirements in the current TS Section 2.8.3(1), “Spent Fuel Assembly Storage.” The staff agrees that this change is editorial in nature and is acceptable.

#### 3.2.2.4 TS Section 4.3.1.1.g

FCS proposed TS 4.3.1.1.g deviates from the STS 4.3.1.1.f wording as follows: 1) it replaces “unacceptable range” with “unacceptable domain,” 2) it replaces “Figure [3.7.18.1]” with “Figure 2-10,” and 3) it replaces “compliance with the NRC approved [specific document containing the analytical methods, title, date, or specific configuration or figure]” with “Region 1 in compliance with Reference (1).” The proposed changes: 1) specify where the spent fuel falling within this burnup domain will be stored, 2) incorporate the reference prescribing the storage requirement, and 3) modify the STS wording to be consistent with the terminology of existing TS Figure 2-10. The word “range” has been revised to “domain” to be consistent with the wording used in existing FCS TS Figure 2-10. The staff agrees that in this context the word “domain” meets the intent of the TS using the word “range.” The current TS Section 2.8.3(1), “Spent Fuel Assembly Storage” was approved in Amendment 174 (Reference 1 of above). The NRC staff has verified that the proposed changes are consistent with the plant-specific requirements in the current TS Section 2.8.3(1), “Spent Fuel Assembly Storage.” The staff agrees that this change is editorial in nature and is acceptable.

#### 3.2.2.5 TS Section 4.3.1.2.b

FCS TS Section 4.3.1.2.b is revised from the STS wording of “ $k_{\text{eff}} = 0.98$  if fully flooded with unborated water, which includes an allowance for uncertainties as described in [Section 9.1 of the FSAR]” to “ $k_{\text{eff}} = 0.95$  if fully flooded with unborated water, which includes an allowance for uncertainties as described in Reference (2).” This revision is needed because the licensed FCS limit of  $k_{\text{eff}}$  for the new fuel storage racks is 0.95. The NRC staff confirmed that the FCS  $k_{\text{eff}}$  limit of the new fuel storage racks is 0.95. The staff agrees that this change is administrative in nature and is acceptable.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Nebraska State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is

no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (70 FR 29798). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: A. Wang

Attachments: 1. Table 1: Less Restrictive Requirements  
2. Table 2: Administrative Changes to STS

Date: October 3, 2005

**Description of Changes and Justification  
For Revisions of  
Technical Specifications Table 1-1 and Section 4.0**

**TABLE 1: LESS RESTRICTIVE REQUIREMENTS – REMOVAL OF DETAIL**

| Change No. | Affected FCS Technical Specification | Summary of Change  | New Location | Change Control | Characterization   |
|------------|--------------------------------------|--|--------------|----------------|--|
| 1          | 1.0<br>Table 1-1<br>Item 3           | FCS TS 1.0 Table 1-1, Item 3, Trip Setpoints description is revised to relocate the statement “(Top of feedwater ring; 4’10” below normal water level).” This phrase is descriptive information which does not meet 10 CFR 50.36 criteria. This information for the replacement steam generators will be moved to the USAR to relocate unnecessary detail from the FCS Tech Specs under the change controls of 10 CFR 50.59. This information is not contained in the comparable table for Standard Technical Specifications (STS) NUREG-1432. | USAR         | 10 CFR 50.59   | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria. |
| 2          | 4.2                                  | FCS Section 4.2, Containment Design Features, is not included in the STS because these features are typically addressed in the USAR.   | USAR         | 10 CFR 50.59   | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria. |
| 3          | 4.3.1 & 4.3.3                        | FCS Sections 4.3.1, Reactor Coolant System, and 4.3.3, Emergency Core Cooling, are not included in the STS because these features do not meet 10 CFR 50.36(c)(4) criteria and are typically contained in the USAR.   | USAR         | 10 CFR 50.59   | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria. |

|   |       |  |      |              |  |
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| 4 | 4.4.1 | FCS TS 4.4.1 states that, "The new unirradiated fuel bundles will normally be stored in the dry new fuel storage rack with an effective multiplication factor of less than 0.9." This information is not included in the STS because these features are typically addressed in the USAR.   | USAR | 10 CFR 50.59 | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria.   |
| 5 | 4.4.1 | FCS TS 4.4.1 states that, "The new fuel storage rack is located 18'-9" above the main floor of Room 25A which provides for adequate drainage and precludes flooding of the new fuel storage rack." This information is not included in the STS because these features are typically addressed in the USAR.   | USAR | 10 CFR 50.59 | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria.   |
| 6 | 4.4.1 | FCS TS 4.4.1 states that, "New fuel may also be stored in shipping containers or in the spent fuel pool racks which have a maximum effective multiplication factor of 0.95 with Fort Calhoun Type C fuel and unborated water." This statement is not relevant to the discussion of the new fuel storage racks. Therefore, it is not included in the STS. | USAR | 10 CFR 50.59 | Removal of descriptive information which is already located in Tech. Spec Bases 2.8.3(1) and contained in USAR Reference 9.5-6, EA-FC-96-001, Rev 0 and does not meet 10 CFR 50.36 criteria. |
| 7 | 4.4.1 | FCS TS 4.4.1 states that, "The new fuel storage racks are designed as a Class I structure." This statement is not included in the STS because it is contained in the USAR.   | USAR | 10 CFR 50.59 | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria.   |

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|----|-------|--|------|--------------|--|
| 8  | 4.4.2 | FCS TS 4.4.2 states that, "Irradiated fuel bundles will be stored prior to off-site shipment in the stainless steel lined spent fuel pool. The spent fuel pool is normally filled with borated water with a concentration of at least the refueling boron concentration." This statement is not included in the STS because it is typically contained in the USAR. | USAR | 10 CFR 50.59 | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria. |
| 9  | 4.4.2 | FCS TS 4.4.2 states that, "The spent fuel racks are designed as a Class I structure." This statement is not included in the STS because it is typically contained in the USAR.   | SAR  | 10 CFR 50.59 | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria. |
| 10 | 4.4.2 | FCS TS 4.4.2 states that, "Normally the spent fuel pool cooling system will maintain the bulk water temperature of the pool below 120°F. Under other conditions of fuel discharge, the fuel pool water temperature is maintained below 140°F." This statement is not included in the STS because it is typically contained in the USAR.                            | USAR | 10 CFR 50.59 | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria. |

|    |       |   |      |              |  |
|----|-------|---|------|--------------|--|
| 11 | 4.4.2 | FCS TS 4.4.2 states that, "The spent fuel racks are designed and will be maintained such that the calculated effective multiplication factor is no greater than 0.95 (including all known uncertainties) assuming the pool is flooded with unborated water. The racks are divided into 2 regions. Storage in Region 1 and Region 2 of the spent fuel racks shall be restricted to fuel assemblies having initial enrichment less than or equal to 4.5 weight percent of U-235. Region 1 and 2 cells are surrounded by Boral. Acceptance criteria for fuel storage in Regions 1 and 2 are delineated in Section 2.8 of these Technical Specifications. " These statements are not included in the STS because they are typically contained in the USAR and in some cases are restated by the STSs. | USAR | 10 CFR 50.59 | Removal of descriptive information which is already located in Tech. Spec Bases 2.8.3(1) and contained in USAR Reference 9.5-6, EA-FC-96-001, Rev 0 and does not meet 10 CFR 50.36 criteria. |
| 12 | 4.5   | FCS Section 4.5, Seismic Design for Class I Systems, is not included in the STS because these features are typically addressed in the USAR.   | USAR | 10 CFR 50.59 | Relocation of descriptive information which does not meet 10 CFR 50.36 criteria.   |

**TABLE 2: ADMINISTRATIVE CHANGES  
TO STANDARD TECHNICAL SPECIFICATIONS**

| Affected<br>FCS Technical<br>Specification | Summary of Change  |
|--|--|
| 4.3.1.1.c and<br>4.3.1.1.d                 | FCS Technical Specifications 4.3.1.1.c and 4.3.1.1.d are revised from the STS to include "Region 2" and "Region 1", respectively, to assure consistent nomenclature of the high and low density fuel storage racks to be consistent with the nomenclature presented on existing FCS TS Figure 2-10.  |
| 4.3.1.1.e                                  | FCS TS 4.3.1.1.e is revised from the 4.3.1.1.e STS wording as follows: 1) "acceptable range" is changed to "acceptable domain," 2) "Figure [3.7.18.1]" is changed to "Figure 2-10 for "Region 2 Unrestricted,"" 3) "[either]" is replaced with "any of the Region 2," and 4) after "storage rack(s)" add "in compliance with Reference (1)", to specify: 1) where the spent fuel falling within this burnup domain will be stored, 2) incorporate the reference prescribing the storage requirement, and 3) be consistent with the terminology of existing TS Figure 2-10.   |
| 4.3.1.1.f                                  | FCS TS 4.3.1.1.f is added based on revisions to the 4.3.1.1.e STS wording as follows: 1) Delete "New or," 2) begin the specification with "Partially," 3) replace "the "acceptable range"" with "between the "acceptable domain" and "Peripheral Cells,"" 4) replace "Figure [3.7.18-1]" with "Figure 2-10", 5) replace "[either]" with "peripheral cells of Region 2 storage," 6) after "storage rack(s)" add "in compliance with Reference (1)," to specify: 1) where the spent fuel falling within this burnup domain will be stored, 2) incorporate the reference prescribing the storage requirement, and 3) be consistent with the terminology of existing TS Figure 2-10. |
| 4.3.1.1.g                                  | FCS TS 4.3.1.1.g is revised from the 4.3.1.1.f STS wording as follows: 1) replace "unacceptable range" with "unacceptable domain," 2) replace "Figure [3.7.18.1]" with "Figure 2-10," 3) replace "compliance with the NRC approved [specific document containing the analytical methods, title, date, or specific configuration or figure]" with "Region 1 in compliance with Reference (1)." to specify: 1) where the spent fuel falling within this burnup domain will be stored, 2) incorporate the reference prescribing the storage requirement, and 3) be consistent with the terminology of existing TS Figure 2-10.  |
| 4.3.1.2.b                                  | FCS TS 4.3.1.2.b is revised from the STS wording of " $k_{eff} = 0.98$ if fully flooded with unborated water, which includes an allowance for uncertainties as described in [Section 9.1 of the FSAR]" to " $k_{eff} = 0.95$ if fully flooded with unborated water, which includes an allowance for uncertainties as described in Reference (2)." This revision is needed because the licensed FCS limit of the new fuel storage racks is 0.95.  |



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