



LIC-11-0087
August 19, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

- REFERENCES:
1. Docket No. 50-285
 2. Letter from OPPD (Jeffrey A. Reinhart) to NRC (Document Control Desk), "Revision to Technical Specification (TS) 2.15, Table 2-5, Item 1 and TS 3.1, Table 3-3, Items 1, 2 and 4 Control Element Assembly Position Indication and Correction of TS 2.10.2(7)c," dated July 12, 2010 (LIC-10-0034) (ML101930443)
 3. Letter from NRC (Lynnea Wilkins) to OPPD (D. J. Bannister), "Request For Additional Information Re: License Amendment Request To Revise Technical Specification (TS) 2.15, Table 2-5, Item 1 and TS 3.1, Table 3-3, Items 1, 2, and 4, Control Element Assembly Position Indication and Correction of TS 2.10.2(7)c, (TAC No. ME4230)," dated January 11, 2011 (NRC-11-0001) (ML103550188)
 4. Letter from OPPD (Jeffrey A. Reinhart) to NRC (Document Control Desk), "Response to NRC Request for Additional Information (RAI) Regarding Independence of CEA Full-in and Full-out Indication from Primary and Secondary Control Element Assembly (CEA) Position Indication Systems (CEAPIS)" dated February 4, 2011 (LIC-11-0002) (ML110380127)

SUBJECT: Partial Withdrawal of Fort Calhoun Station, Unit No. 1, License Amendment Request (LAR) "Revision to Technical Specification (TS) 2.15, Table 2-5, Item 1 and TS 3.1, Table 3-3, Items 1, 2 and 4 Control Element Assembly (CEA) Position Indication and Correction of TS 2.10.2(7)c"

The Omaha Public Power District (OPPDP) hereby requests a partial withdrawal of its License Amendment Request (LAR) of Reference 2. OPPD has elected not to change TS 3.1, Table 3-3, Item 2.a following discussions with the NRC that occurred since OPPD responded (Reference 4) to an NRC request for additional information

(Reference 3). The NRC request pertained to the independence of the CEA position indication system channels.

The result of leaving TS 3.1, Table 3-3, Item 2.a unchanged is that the CHANNEL CHECK of the primary CEA position indication system channel can be accomplished through comparison of its data with either distributed control system (DCS) core mimic (if available) or the secondary CEA position indication system channel. However, surveillance of the secondary CEA position indication system channel can only be met by comparison with the primary CEA position indication system channel.

No commitments to the NRC are made in this letter.

If you should have any questions regarding this submittal or require additional information, please contact Mr. Bill R. Hansher at (402) 533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 19, 2011.



Jeffrey A. Reinhart
Site Vice President

Attachments 1. Technical Specification Page Markup
2. Retyped ("Clean") Technical Specification Page

c: Director of Consumer Health Services, Department of Regulation and Licensure,
Nebraska Health and Human Services, State of Nebraska

Technical Specification Page Markup¹

¹ Deleted text shown in ~~strikeout~~; added text in underline.

TABLE 3-3

**MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TESTING
OF MISCELLANEOUS INSTRUMENTATION AND CONTROLS**

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
1. Primary CEA Position Indication System	a. Check	S	a. Comparison of output data with secondary CEAPIS. CHANNEL CHECK
	b. Test	M	b. Test of power dependent insertion limits, deviation, and sequence monitoring systems.
	c. Calibrate	R	c. Physically measured CEDM position used to verify system accuracy. Calibrate CEA position interlocks.
2. Secondary CEA Position Indication System	a. Check	S	a. Comparison of output data with primary CEAPIS.
	b. Test	M	b. Test of power dependent insertion limit, deviation, out-of-sequence, and overlap monitoring systems.
	c. Calibrate	R	c. Calibrate secondary CEA position indication system and CEA interlock alarms.
3. Area and Post-Accident Radiation Monitors ⁽¹⁾	a. Check	D	a. CHANNEL CHECK
	b. Test	Q	b. CHANNEL FUNCTIONAL TEST
	c. Calibrate	R	c. Secondary and Electronic calibration performed at refueling frequency. Primary calibration with exposure to radioactive sources only when required by the secondary and electronic calibration. RM-091 A/B - Calibration by electronic signal substitution is acceptable for all range decades above 10 R/hr. Calibration for at least one decade below 1-R/hr. shall be by means of calibrated radiation source.

⁽¹⁾Post Accident Radiation Monitors are: RM-063, RM-064, and RM-091A/B. Area Radiation Monitors are: RM-070 thru RM-082, RM-084 thru RM-089, and RM-095 thru RM-098.

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TECHNICAL SPECIFICATIONS

TABLE 3-3

MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TESTING OF MISCELLANEOUS INSTRUMENTATION AND CONTROLS

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
1. Primary CEA Position Indication System	a. Check	S	a. CHANNEL CHECK
	b. Test	M	b. Test of power dependent insertion limits, deviation, and sequence monitoring systems.
	c. Calibrate	R	c. Physically measured CEDM position used to verify system accuracy. Calibrate CEA position interlocks.
2. Secondary CEA Position Indication System	a. Check	S	a. Comparison of output data with primary CEAPIS.
	b. Test	M	b. Test of power dependent insertion limit, deviation, out-of-sequence, and overlap monitoring systems.
	c. Calibrate	R	c. Calibrate secondary CEA position indication system and CEA interlock alarms.
3. Area and Post-Accident Radiation Monitors ⁽¹⁾	a. Check	D	a. CHANNEL CHECK
	b. Test	Q	b. CHANNEL FUNCTIONAL TEST
	c. Calibrate	R	c. Secondary and Electronic calibration performed at refueling frequency. Primary calibration with exposure to radioactive sources only when required by the secondary and electronic calibration. RM-091 A/B - Calibration by electronic signal substitution is acceptable for all range decades above 10 R/hr. Calibration for at least one decade below 1-R/hr. shall be by means of calibrated radiation source.

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