Omaha Public Power District

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May 25, 1979

Mr. K. V. Seyfrit, Director
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Seyfrit:

The Omaha Public Power District received IE Bulletin 79-06B, dated April 14, 1979, requesting that a review of operational errors and system misalignments identified during the Three Mile Island incident be made and that certain information be provided on this subject relevant to the Fort Calhoun Station. A response to the bulletin was submitted to the Commission by letter, dated April 23, 1979, which included a commitment that an individual be stationed in the main control room at the station with the sole duty of promptly initiating adequate auxiliary feedwater to the steam generators for those transients or accidents, the consequences of which can be limited by such action. This commitment was made pending the staff's review of the District's response to IE Bulletin 79-06B and subsequent concurrence that Fort Calhoun's auxiliary feedwater system is adequately designed and operated without the need for a dedicated operator manning the system controls.

On May 11, 1979, District representatives met with members of the staff in Washington, D. C. to discuss the Fort Calhoun auxiliary feedwater system. At this meeting, design and operational features of the system were discussed, with emphasis on the following areas which demonstrate system adequacy:

1. All controls for the system are located in the control room in an area easily accessible to the minimum two man crew present in the control room during operation.

2. The system contains certain automatic features. First, auxiliary feedwater pumps are automatically initiated upon trip of the last main feedwater pump. Feedwater flow to the steam generators is then initiated automatically if a containment isolation signal (CIAS) is received. In this case, valves HCV-1107A/B and HCV-1108A/B open automatically to direct water to the auxiliary feedwater nozzles in the steam generators.

Mr. R. V. Heyfrit
[illegible], 1979
Page [illegible]

(In the absence of CIAS, auxiliary feedwater flow must be initiated by remote-manual opening of HCV-1107A/B and HCV-1108A/B to the auxiliary feedwater nozzles or by opening HCV-1384 to the main feedwater header and sparger when the last main feedwater pump trips.)

3. The loss of feedwater flow incident analysis in the Fort Calhoun FSAR assumes that auxiliary feedwater flow is not initiated for a full 12 minutes, which provides ample time for operator action in the control room, if required.

4. Performance of the auxiliary feedwater system is easily monitored by flow indication and steam generator level indication in the control room.

In view of the information presented in the District's response of [illegible], 1979, and the information provided in our meeting with the [illegible], it is respectfully requested that the requirement that a dedicated [illegible] be stationed at the auxiliary feedwater system controls be relieved. The relief requested would provide for more effective use of [illegible] operators without causing any reduction in the level of safety [illegible] by the auxiliary feedwater system.

Sincerely,

T. E. Short
Assistant General Manager

[illegible]

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