

BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
OMAHA PUBLIC POWER DISTRICT)	Docket No. 50-285
(Fort Calhoun Station,)	
Unit No. 1))	

APPLICATION FOR AMENDMENT
OF
OPERATING LICENSE

Pursuant to Section 50.60 of the regulations of the U. S. Nuclear Regulatory Commission ("the Commission"), Omaha Public Power District, holder of Facility Operating License No. DPR-40, herewith requests that Section 2.3 of the Technical Specifications set forth in Appendix A to that License be amended to remove the requirements that, when one train of a redundant system is inoperable, non-redundant pumps and valves in the remaining train be cycled.

The proposed changes in Technical Specifications are set forth in Attachment A to this Application. A discussion, which demonstrates that the proposed changes do not involve significant hazards considerations, is appended in Attachment B. The proposed Amendment is deemed to be Class II Amendment, within the meaning of Section 170.22 of the regulations of the U. S. Nuclear Regulatory Commission. This Application is exempted from the fee requirement because it is submitted in response to a Commission request made in a letter from the Commission to the District, dated November 22, 1976, regarding NRC staff guidelines for excluding exercising tests of certain valves during plant operation.

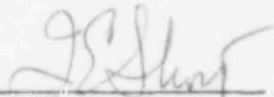
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This Application is intended to simplify or clarify the Technical Specifications, has only minor safety significance, and is issued for the convenience of the Commission. The proposed changes in specifications would not authorize any change in the types or any increase in the amounts of effluents or any change in the authorized power level of the facility.

WHEREFORE, Applicant respectfully requests that Section 2.3 of Appendix A to Facility Operating License No. DPR-40 be amended in the form attached hereto as Attachment A.

OMAHA PUBLIC POWER DISTRICT

By

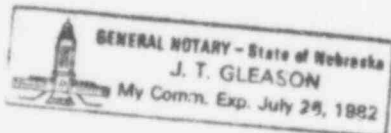


T. E. Short

Assistant General Manager

Subscribed and sworn to before me

this 2ND day of JULY, 1979.


Notary Public

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2.0 LIMITING CONDITIONS FOR OPERATION
2.3 Emergency Core Cooling System (Continued)

(2) Modification of Minimum Requirements

During power operation, the Minimum Requirements may be modified to allow one of the following conditions to be true at any one time. If the system is not restored to meet the minimum requirements within the time period specified below, the reactor shall be placed in a hot shutdown condition within 12 hours. If the minimum requirements are not met within an additional 48 hours the reactor shall be placed in a cold shutdown condition within 24 hours.

- a. One low-pressure safety injection pump may be inoperable provided the pump is restored to operable status within 24 hours.
- b. One high-pressure safety injection pump may be inoperable provided the pump is restored to operable status within 24 hours.
- c. One shutdown heat exchanger and two of four component cooling water heat exchangers may be inoperable for a period of no more than 24 hours.
- d. Any valves, interlocks or piping directly associated with one of the above components and required to function during accident conditions shall be deemed to be part of that component and shall meet the same requirements as listed for that component.
- e. Any valve, interlock or piping associated with the safety injection and shutdown cooling system which is not covered under d. above but which is required to function during accident conditions may be inoperable for a period of no more than 24 hours.
- f. One safety injection tank may be inoperable for a period of no more than one hour.
- g. Level and pressure instrumentation on one safety injection tank may be inoperable for a period of one hour.

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2.0 LIMITING CONDITIONS FOR OPERATION
2.3 Emergency Core Cooling System (Continued)

If a component is found to be inoperable, it will be possible in most cases to effect repairs and restore the system to full operability within a relatively short time. For a single component to be inoperable does not negate the ability of the system to perform its function. If it develops that the inoperable component is not repaired within the specified allowable time period, the reactor will initially be put in the hot shutdown condition to provide for reduction of cooling requirements after a postulated loss-of-coolant accident. This will also permit improved access for repairs in some cases. After a limited time in hot shutdown, if the malfunction(s) is not corrected, the reactor will be placed in the cold shutdown condition utilizing normal shutdown and cooldown procedures. If the cold shutdown condition, release of fission products or damage of the fuel elements is not considered possible.

The plant operating procedures will require immediate action to effect repairs of an inoperable component and therefore in most cases repairs will be completed in less than the specified allowable repair times. The limiting times to repair are intended to assure that operability of the component will be restored promptly and yet allow sufficient time to effect repairs using safe and proper procedures.

The requirement for core cooling in case of postulated loss-of-coolant accident while in the hot shutdown condition is significantly reduced below the requirements for a postulated loss-of-coolant accident during power operation. Putting the reactor in the hot shutdown condition reduces the consequences of a loss-of-coolant accident and also allows more free access to some of the engineered safeguards components in order to effect repairs.

Failure to complete repairs within 48 hours of going to the hot shutdown condition is considered indicative of a requirement for major maintenance and, therefore, in such a case, the reactor is to be put into the cold shutdown condition.

With respect to the core cooling function, there is functional redundancy over most of the range of break sizes. (3)(4)

The LOCA analysis confirms adequate core cooling for the break spectrum up to and including the 32 inch double-ended break assuming the safety injection capability which most adversely affects accident consequences and are defined as follows. The entire contents of all four safety injection tanks are assumed to be available for emergency core cooling, but the contents of one of the tanks is assumed to be lost through the reactor coolant system. In addition, of the three high-pressure

2.0 LIMITING CONDITIONS FOR OPERATION
2.4 Containment Cooling (Continued)

During power operation one of the components listed above (in addition to one raw water pump) may be inoperable. If the inoperable component is not restored to operability within seven days, the reactor shall be placed in a hot shutdown condition within 12 hours. If the inoperable component is not restored to operability within an additional 48 hours, the reactor shall be placed in a cold shutdown condition within 24 hours.

(2) Modification of Minimum Requirements

During power operation, the minimum requirements may be modified to allow a total of two of the components listed in a. and b. to be inoperable at any one time (in addition to one raw water pump) provided that the emergency diesel-generator connected to the other engineered safeguards 4.16-kV bus (1A4 or 1A3) is started to demonstrate operability. Only two raw water pumps may be out of service. If the operability of both components is not restored within 24 hours, the reactor shall be placed in a hot shutdown condition within 12 hours. If the operability of both components is not restored within an additional 48 hours, the reactor shall be placed in a cold shutdown condition within 24 hours.

Any valves, interlocks and piping directly associated with one of the above components and required to function during accident conditions shall be deemed to be part of that component and shall meet the same requirements as for that component.

Any valve, interlock or piping associated with the containment cooling system which is not included in the above paragraph and which is required to function during accident conditions may be inoperable for a period of no more than 24 hours. If operation is not restored within 24 hours, the reactor shall be placed in a hot shutdown condition within 12 hours.

Basis

The requirements of Section 2.3, Emergency Core Cooling System, apply to the specifications above with respect to the operability of the

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DISCUSSION

The Nuclear Regulatory Commission has requested that the Fort Calhoun Technical Specifications be modified in order to be compatible with a letter sent to the Omaha Public Power District from the Commission, dated November 22, 1976. Specifically, an attachment to the letter entitled "NRC Staff Guidelines for Excluding Exercising (Cycling) Tests of Certain Valves During Plant Operation" requires that, when one train of a redundant system such as in the Emergency Core Cooling System is inoperable, nonredundant valves in the remaining train should not be cycled since their failure would cause a loss of total system function. The Fort Calhoun Technical Specifications currently have a requirement contrary to this guideline which requires that, prior to initiating repairs to certain safety related systems, all valves and interlocks that provide the duplicate function to the inoperable equipment be tested to demonstrate operability. The proposed change removes the conflict between the Technical Specifications and the Staff Guidelines. In addition, it deletes testing of redundant safety related pumps when one of the safety related pumps is inoperable. This is because, in many instances, valves must be stroked to permit operation of a pump, thus violating the subject Staff Guidelines. The proposed changes do not constitute an Unreviewed Safety Question or jeopardize the health and safety of the public. Component operability is assured, at all times, by inservice inspection and testing pursuant to 10 CFR § 50.55a.

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