

U.S. Nuclear Regulatory Commission
LIC-93-0256

ATTACHMENT A

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- a. Core Operating Limits shall be established and documented in the Core Operating Limits Report (COLR) before each reload cycle or any remaining part of a reload cycle.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC as follows:
 1. OPPD-NA-8301-P-A, Rev.—4 "Reload Core Analysis Methodology Overview" dated April 1991. (Latest NRC approved revision as stated in the COLR).
 2. OPPD-NA-8302-P-A, Rev.—2 "Neutronics Design Methods and Verification" dated April 1988. (Latest NRC approved revision as stated in the COLR).
 3. OPPD-NA-8303-P-A, Rev.—3 "Transient and Accident Methods and Verification" dated March 1991. (Latest NRC approved revision as stated in the COLR).
 4. ~~Safety Evaluation By The Office of Nuclear Reactor Regulation Related to Amendment No. 143 to Facility Operating License No. DPR-40, Omaha Public Power District, Fort Calhoun Station Unit No. 1, Docket No. 50-285, dated April 2, 1992.~~
- c. The core operating limits shall be determined so that all applicable limits of the safety analysis are met. The Core Operating Limits Report, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Region IV Administrator and Senior Resident Inspector.

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ATTACHMENT B

DISCUSSION, JUSTIFICATION AND NO SIGNIFICANT HAZARDS CONSIDERATIONS

DISCUSSION AND JUSTIFICATION

The Omaha Public Power District (OPPD) proposes to revise the Fort Calhoun Station Unit No. 1 Technical Specifications to implement administrative changes. The following is a list of pages affected and the paragraphs where the proposed changes are described.

Page iii	- See paragraph	25	Page 3-56	- See paragraph	1
Page 4	- See paragraph	3	Page 3-60	- See paragraphs	1 & 16
Page 1-4	- See paragraph	2	Page 3-61	- See paragraph	17
Page 1-8	- See paragraph	2	Page 3-62	- See paragraphs	1 & 18
Page 2-15a	- See paragraph	2	Page 3-76	- See paragraph	19
Page 2-18	- See paragraph	4	Page 3-77	- See paragraph	1
Page 2-20	- See paragraph	5	Page 3-79	- See paragraph	1
Page 2-22	- See paragraph	6	Page 3-84	- See paragraphs	1 & 20
Page 2-57e	- See paragraph	7	Page 4-4	- See paragraph	21
Page 2-58	- See paragraph	8	Page 5-1	- See paragraph	22
Page 2-62	- See paragraphs	9 & 10	Page 5-4	- See paragraph	23
Page 2-64	- See paragraph	9	Page 5-5	- See paragraph	23
Page 2-66	- See paragraph	11	Page 5-6	- See paragraphs	23 & 24
Page 2-68a	- See paragraph	12	Page 5-7	- See paragraphs	23 & 25
Page 3-0a	- See paragraph	1	Page 5-8	- See paragraphs	23 & 25
Page 3-1	- See paragraph	1	Page 5-8a	- See paragraph	25
Page 3-15	- See paragraph	13	Page 5-9	- See paragraphs	23 & 25
Page 3-18	- See paragraph	14	Page 5-12	- See paragraph	26
Page 3-21	- See paragraph	15	Page 5-17a	- See paragraph	27
Page 3-40	- See paragraph	1			
Page 3-54	- See paragraph	1			

25. Pages 5-7, 5-8, 5-9, and Page iii of the Table of Contents

It is proposed to revise Specification 5.5.2.8 and Specification 5.5.3 to be more consistent with the CE Standard Technical Specification 6.5.2.8 (NUREG-0212 R2). Specification 5.5.3 will be deleted and incorporated into 5.5.2.8. Since Specification 5.5.3.a is being moved to 5.5.2.8 the sentence stating that this audit is under the cognizance of the SARC is no longer required and is being deleted. The audit schedule for review of the Emergency Plan and Safeguards Contingency Plan are being maintained at a 12 month interval consistent with 10 CFR 50.54. The requirement to audit the Radiological Effluent Program, Specification 5.5.2.8.h, is being maintained as it is included in NUREG-1432. Page iii of the Table of Contents is being revised to reflect the deletion of Specification 5.5.3.

26. Page 5-12

It is proposed to revise Specification 5.9.1.c to indicate that the Monthly Operating Report will be submitted "no later than the fifteenth of each month" instead of "to arrive no later than the fifteenth" of each month. This requirement is consistent with CE Standard Technical Specification 6.9.1.6 (NUREG-0212 R2).

27. Page 5-17a

It is proposed to revise Specification 5.9.5 to remove the revision numbers and dates of the NRC approved reload analysis topical reports and indicate reference to the latest NRC approved revision as stated in the Core Operating Limits Report (COLR). Also, Item No. 4, which references an NRR Safety Evaluation related to Amendment No. 143, is being deleted. The analytical method approved by the NRC in the Safety Evaluation Report was incorporated into the latest revision of OPPD-NA-8302-P-A "Neutronics Design Methods and Verification," therefore, Item No. 4 no longer applies.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION:

The proposed changes do not involve significant hazards considerations because operation of Fort Calhoun Station Unit No. 1 in accordance with these changes does not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes include: administrative changes to correct typographical errors, references and revision numbers; make the specifications consistent; provide clarifications; and to make changes consistent with organizational changes, or with the CE Standard Technical Specifications.

The clarification to the basis of Specification 2.1.6 provides a discussion on: the presence of water filled loop seals, the potential effects the loop seal may have on the setpoint deviation of the safety valves, and that any effect is within the results of the Updated Safety Analysis Report.

The clarification to Specification 2.2(2)d1. provides an additional requirement to maintain valve LCV-218-3 operable which is consistent with the intent of the specification in that the valve must be operable to maintain the required flow path from the Safety Injection and Refueling Water (SIRW) tank.

The clarification to Specification 2.3(1) states which electrical buses the safety injection pumps are powered through and is consistent with the Updated Safety Analysis Report, Section 14.15, which assumes that only one full capacity high pressure pump and one full capacity low pressure pump are available during a Loss of Coolant Accident.

The clarification to the basis of Specification 2.14 only deletes the reference to the specific time for a valve to open.

The clarification to Specification 3.7(3) adds verbiage to state that the emergency lighting system required to be tested by this specification is the emergency lighting system required to achieve a plant safe shutdown.

The proposed revision to Specification 5.9.5 merely incorporates reference to the latest NRC approved revisions of the topical reports as stated in the Core Operating Limits Report (COLR). The change does not modify the methodology or the manner in which they may be implemented.

The proposed changes are administrative in nature and are consistent with the assumptions or results stated in the Updated Safety Analysis Report; therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Create the possibility of a new or different kind of accident from any previously analyzed.

The proposed administrative changes correct typographical errors, revision numbers and references, and implement changes to make the Specifications consistent. No new or different operation of plant equipment is proposed. No new or different action statements are proposed. Therefore, the proposed changes do not create the possibility of a new or different type of accident.

- (3) Involve a significant reduction in a margin of safety.

The proposed administrative changes correct typographical errors and references, and implement changes to make the Specifications consistent. The clarifications being proposed are within the assumptions or results as stated in the Updated Safety Analysis Report; therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Therefore, based on the above considerations, it is OPPD's position that this proposed amendment does not involve significant hazards considerations as defined by 10 CFR 50.92 and the proposed changes will not result in a condition which significantly alters the impact of the Station on the environment. Thus, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared.