

Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

November 2, 1994
LIC-94-0192

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

References: 1. Docket No. 50-285
2. Letter from NRC (K. V. Seyfrit) to OPPD (W. C. Jones) dated March 13, 1980 (NRC IE Bulletin 80-06)
3. Letter from OPPD (W. C. Jones) to NRC (K. V. Seyfrit) dated June 6, 1980 (LIC-80-0068)

SUBJECT: Updated Response to NRC Information Bulletin (IEB) 80-06,
"Engineered Safety Feature (ESF) Reset Controls"

The Omaha Public Power District (OPPD) provides this update to its original response to NRC Information Bulletin (IEB) 80-06, as provided in Reference 3. IEB 80-06 required that utilities identify any ESF signal actuated equipment that returns to its pre-accident state following reset of the ESF signal. If any safety-related equipment was identified as "not remain(ing) in its emergency mode upon reset of an ESF signal," OPPD was to "describe proposed system modification, design change, or other corrective action planned to resolve the problem... and include... a schedule for implementation of corrective action."

During the Fort Calhoun Station (FCS) design basis reconstitution project, it was identified that the Control Room Heating, Ventilation and Air Conditioning (HVAC) may not conform to the requirements of IEB 80-06. This issue has been tracked as Design Basis Document (DBD) IC-32, "Instrument and Control Systems" Open Item No. 33, while analyses were completed to confirm or negate conformance with IEB 80-06.

9411150070 941102
PDR ADOCK 05000285
Q PDR

The specific non-conforming condition involves the filtered air makeup mode of the Control Room HVAC System. On ESF actuation, the Control Room HVAC is automatically placed in the filtered air makeup mode where outside makeup air is rerouted through a charcoal filter to minimize radio-nuclide exposure following a Design Basis Accident (DBA). On ESF actuation signal reset, the running filtered air makeup fan (VA-63A or VA-63B) is shutdown and the dampers are realigned, into the fresh air mode of operation.

A review of the Control Room Habitability (CRH) Calculation (FC05549) indicated that the Control Room is assumed to be in the filtered air makeup mode for 30 days following a Loss of Coolant Accident (LOCA). The ESF initiating lockout relays which place the Control Room HVAC in the filtered air makeup mode may be reset before the 30-day dose calculation assumption. The CRH calculation shows exposure to operators for the 30 days (in the filtered air makeup mode) to be below the Regulatory Limit. The Control Room is provided with radiation monitoring (RM-065) that also starts on an ESF actuation and would alert the operators in the event that airborne activity was brought into the Control Room. The Emergency Plan Implementing Procedures require periodic monitoring of the Control Room environment to ensure habitability in the event of a DBA. Therefore, this condition is not considered safety significant.

As resolution to this issue, OPPD has revised the applicable Emergency Operating Procedures and Abnormal Operating Procedures to require that the operator place the Control Room HVAC manual mode select switch in the filtered air makeup mode position after receipt of a Ventilation Isolation Actuation Signal. This will prevent the system from automatically realigning to the unfiltered air makeup mode upon ESF reset. The applicable Annunciator Response Procedures will be revised to instruct the operator when it is acceptable to exit the filtered air makeup mode of operation by November 23, 1994. These procedure revisions will be implemented and the appropriate training will be completed by March 13, 1995.

If you should have any questions, please contact me.

W. G. Gates

W. G. Gates
Vice President

WGG/d11

c: LeBoeuf, Lamb, Greene & MacRae
L. J. Callan, NRC Regional Administrator, Region IV
S. D. Bloom, NRC Project Manager
R. P. Mullikin, NRC Senior Resident Inspector

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

Omaha Public Power District)
(Fort Calhoun Station)
Unit No. 1))

Docket No. 50-285

AFFIDAVIT

W. G. Gates, being duly sworn, hereby deposes and says that he is the Vice President in charge of all nuclear activities of the Omaha Public Power District; that as such he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached information concerning the updated response to NRC Information Bulletin 80-06 dated November 2, 1994; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information, and belief.

W. G. Gates

W. G. Gates
Vice President

STATE OF NEBRASKA)
) ss
COUNTY OF DOUGLAS)

Subscribed and sworn to before me, a Notary Public in and for the State of Nebraska on this 2nd day of November, 1994.

Theresa Petersen
Notary Public

