

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000
March 27, 1984
LIC-84-071

Mr. Darrell G. Eisenhut, Director
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Eisenhut:

**NUREG-0737 Technical Specifications
(Generic Letter 83-37)**

Generic Letter 83-37, dated November 1, 1983, required Omaha Public Power District to submit Technical Specifications required for NUREG-0737 items. The schedule for the District's response to Generic Letter 83-37 was established in a letter to the Commission dated December 6, 1983. Pursuant to that schedule, the District has submitted a license amendment application for several of the items discussed in Enclosure I of Generic Letter 83-37. The purpose of this letter is to address the NUREG-0737 items listed in Enclosure I of the subject generic letter which are not addressed in the District's license amendment application. The status of those items is as follows:

(1) Post Accident Sampling (II.B.3)

In the District's December 6, 1983 letter to the Commission, the post accident sampling system Technical Specification was scheduled to be submitted to the Commission by March 1, 1984. However, since the post accident sampling system is not fully operable, the Technical Specifications have not been submitted. A license amendment application will be submitted on the post accident sampling system when it is declared fully operable. This is in accordance with Generic Letter 83-37 and pursuant to discussions held with Mr. E. G. Tourigny of your staff.

(2) Long Term Auxiliary Feedwater System Evaluation (II.E.1.1)

The District believes the existing Fort Calhoun Station Technical Specifications covering the auxiliary feedwater system ensure the same level of system reliability as do the recommended Combustion Engineering Standard Technical Specifications. Attached is a discussion supporting this conclusion.

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(3) Instrumentation for Detection of Inadequate Core Cooling
(II.F.2)

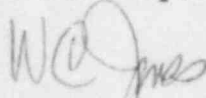
Installation of the inadequate core cooling system is presently ongoing, with installation scheduled during the 1985 refueling outage. A license amendment application will be made on a schedule consistent with that date.

(4) Control Room Habitability (III.D.3.4)

Modifications necessary to resolve the control room habitability issue are currently ongoing, with a scheduled completion date of June 30, 1984. A license amendment application will be made on a schedule consistent with that date.

The District believes the response supplied by this letter and the license amendment application adequately address the requirements of Generic Letter 83-37.

Sincerely,



W. C. Jones
Division Manager
Production Operations

WCJ/JCB:jmm

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Mr. E. G. Tourigny, Project Manager
Mr. L. A. Yandell, Senior Resident
Inspector

Attachment

LONG TERM AUXILIARY FEEDWATER TECHNICAL SPECIFICATION EVALUATION (NUREG-0737, SECTION II.E.1)

In response to NUREG-0737 Technical Specifications Generic Letter 83-37, which required licensees to submit proposed Technical Specifications for items scheduled after December 31, 1981, the following discussion is submitted which reviews and compares the existing Fort Calhoun Station Technical Specifications to points covered in the typical generic Technical Specifications as they relate to the auxiliary feedwater system. The Technical Specifications section numbers used in the following discussion refer to the sections as they are numbered in the generic Technical Specifications.

Limiting Conditions for Operation

The limiting conditions for operation, Section 3.7.1.2 in the generic Technical Specifications, specify that it is necessary for all auxiliary feedwater pumps and associated flow paths to be operable. This can be compared to the limiting conditions for operation for the Fort Calhoun Station which specify "The reactor coolant system shall not be heated above 300°F unless ..." (refer to the Fort Calhoun Station Technical Specifications, Section 2.5, for detailed specifications of the following):

- (1) Both auxiliary feed pumps are operable.
- (2) There is a minimum of 55,000 gallons of water in the emergency feedwater storage tank, with a backup supply to the Missouri River.
- (3) All valves, interlocks, and piping associated with the system are operable and all manual valves are locked in the required position.
- (4) The main steam isolation valves are operable and capable of closing in 4 seconds or less.

The action to be taken in the event of surpassing limiting conditions for operation for the Fort Calhoun Station is also consistent with that of the generic specifications. The action for the Fort Calhoun Station is that the unit will be placed in hot shutdown within 6 hours, be at least subcritical and 300°F within the next 6 hours, and be in at least cold shutdown within the following 30 hours (refer to the Fort Calhoun Station Technical Specifications, Section 2.0.1, for detailed specifications of the above).

Surveillance Requirements

For each applicable section in the generic specifications, the equivalent Fort Calhoun Station Technical Specifications can be compared as follows:

- a.1: The generic specifications have to verify that the motor driven pump capabilities exceed certain limits. This corresponds to the Fort Calhoun Station Technical Specifications, Sections 3.9.2 and 3.9.3, which verify the operability and capability of both auxiliary feedwater pumps, respectively. The generic specifications indicated that this be done monthly. The Fort Calhoun Station Technical Specifications require this to be done only quarterly. The Fort Calhoun Station Technical Specifications are based on the latest inservice test procedures which specify that the pumps and valves be tested quarterly. Specifically, Article IWP-3400 states the frequency of inservice testing for pumps and Article IWV-3411 states the frequency for valve exercising. The actual test performed is ST-FW-1 F.2, which verifies that each pump operates at least 40 psig above steam generator pressure.
- a.2: This section has to verify the capability of the steam driven pump. This section is also covered by the Fort Calhoun Station Technical Specifications, Section 3.9.3, and Surveillance Test ST-FW-1 F.2. The Fort Calhoun Station Technical Specifications, Section 3.9.2, also verify the operability of the steam driven pump every 3 months, as governed by the latest inservice test procedures.
- a.3: This section verifies that each non-automatic valve in the flow path is in its correct position. This is covered by Section 3.9.1 of the Fort Calhoun Station Technical Specifications. The Fort Calhoun Station Technical Specifications verify the position of all valves monthly and provides a double operator verification of valve position after any maintenance work. The actual surveillance test is ST-FW-1 F.1, which performs a double operator verification of all auxiliary feedwater valves monthly.
- a.4: The verification of all automatic valves opening is covered in this section. The Fort Calhoun Station Technical Specifications, Section 3.9.2, cover confirming that the automatic valves and auxiliary feedwater cross-tie valve are all operable on a quarterly basis. However, Surveillance Test ST-FW-1 F.1 performs a double operator valve checklist monthly. This covers all auxiliary feedwater valves.

a.5: For plants with only one auxiliary feedwater train available during testing, this section provides for a dedicated individual to be stationed near any manually realigned valves. At the Fort Calhoun Station, a train is not lost during testing because there are 2 actuation relays in parallel in each channel. This ensures that a single failure will not inhibit the auxiliary feedwater system. Each channel is capable of starting both trains regardless of the status of the other channel. When a channel is tested, the matrix automatically goes to a 2-out-of-3 logic. On-line testing is performed by placing the channel A and B "AFWS Auto Signal Override" switches in the override position for one generator at a time and closing the related actuation relay contacts one at a time. The turbine driven pump is actually started and all the auxiliary feedwater valves kept closed. During testing of the valves, one valve at a time is opened by its own steam generator actuation relay contact. However, there is normally an I&C Technician in contact with someone in the control room during testing.

b.1 &

b.2: These sections specify that at least once per 18 months during shutdown, the automatic valve operation and auxiliary feedwater pump starts are verified. These sections correspond identically to the Fort Calhoun Station Technical Specifications, Sections 3.9.5a and 3.9.5b. An auxiliary feedwater system functional test, as well as sensor calibration, is performed each refueling according to ST-FW-3 F.4 and ST-FW-3 F.3, respectively.

The only discrepancy is the quarterly versus monthly testing of the auxiliary feedwater pumps and valves. The District believes that quarterly testing justification provided in the inservice inspection code is met and no change is required.