

5.9.5 Core Operating Limits Report

- a. Core Operating Limits shall be established and documented in the Core Operating Limits Report 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. ~~3~~ 4 "Reload Core Analysis Methodology Overview" dated April ~~1988~~ 1991.
 2. OPPD-NA-8302-P-A, Rev. 2 "Neutronics Design Methods and Verification" dated April 1988.
 3. OPPD-NA-8303-P-A, Rev. ~~2~~ 3 "Transient and Accident Methods and Verification" dated ~~April 1988~~ March 1991.
- 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 incorporate the latest NRC approved revisions to core reload topical reports. The proposed changes revises Specification 5.9.5 to reflect approval of Revision 4 to topical report OPPD-NA-8301-P-A, "Reload Core Analysis Methodology Overview," and Revision 3 to topical report OPPD-NA-8303-P-A, "Transient and Accident Methods and Verification," contained in NRC Safety Evaluation Reports dated March 2, 1992.

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 would not:

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

The proposed changes are administrative in nature in that the revisions to the topical reports for conducting reload analyses have been previously reviewed and approved by the NRC in Safety Evaluation Reports dated March 2, 1992. The proposed changes merely incorporate a reference to these approved revisions into the Technical Specifications. Therefore these proposed changes do not involve a significant increase in the probability or consequences of an accident.

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

It has been determined that no new or different kind of accident will be created due to the proposed changes. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed changes merely incorporate a reference to NRC approved methodologies for conducting core reload and accident analyses, therefore the proposed changes do not involve a significant reduction in 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(e)(9) and pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared.