

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

August 5, 1992  
LIC-92-223R

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

References: 1. Docket 50-285  
2. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk)  
dated February 26, 1988 (LIC-88-137)

Gentlemen:

Subject: Revision to a Commitment on Implementation of Technical  
Specification Amendments

In the response (Reference 2) to a violation identified in Inspection Report 87-29 for Fort Calhoun Station (FCS), Omaha Public Power District (OPPD) committed to certain corrective actions to ensure Technical Specification Amendments were properly implemented. These actions were:

*Within the first week after the issuance of an amendment to Technical Specifications, the plant manager and other supervisors are notified of the change and receive a copy of the amendment. This provides each supervisor with the knowledge of a change to Technical Specifications that could potentially affect the various procedures used by his/her group. Per Nuclear Production Division Policy/Procedure G-2, the amendment is placed on the Integrated Regulatory Requirement Action Log (IRR). This document is used by licensing to facilitate orderly handling and tracking of industry requirements and OPPD commitments. The amendment is assigned to cognizant personnel who will ensure that the procedural changes required for an amendment to Technical Specifications will be implemented within 3 weeks of the date of issuance. This is within the 30 day time limit that is usually allowed to implement the amendment.*

Due to evolution of the administrative controls noted above and the need for flexibility in the implementation of changes to Technical Specifications, OPPD is superseding the specific commitments noted above. Implementation of Technical Specification changes will be handled as follows:

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In the FCS Technical Specification amendment application, OPPD will request a reasonable period (e.g. 30 - 120 days after the NRC approved amendment is received by OPPD) in which to implement the amendment. The NRC would then concur with the proposed implementation period or provide an alternate schedule. Administrative procedures and OPPD's Commitment Tracking System (CTS) will ensure that actions necessary to distribute and implement the amendment (e.g. procedure changes or training) are completed in a timely manner. In the event that OPPD cannot complete the actions required to implement the amendment within the implementation period, the NRC Project Manager will be contacted for resolution.

These new commitments have the concurrence of Mr. S. D. Bloom, NRC Acting Project Manager for Fort Calhoun Station. Please contact me if you have any questions.

Sincerely,

*W. G. Gates*

W. G. Gates  
Division Manager  
Nuclear Operations

WGG/sel

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