



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 176 TO FACILITY OPERATING LICENSE NO. DPR-40  
OMAHA PUBLIC POWER DISTRICT  
FORT CALHOUN STATION, UNIT NO. 1  
DOCKET NO. 50-285

1.0 INTRODUCTION

By application dated May 17, 1996, Omaha Public Power District (OPPD) requested changes to Technical Specifications (TS), Sections 2.18 and 3.14, "Shock Suppressors (Snubbers)," 3.3 "Reactor Coolant System and Other Components Subject to ASME XI Boiler & Pressure Vessel Code," and 5.10 "Record Retention," (Appendix A to Facility Operating License No. DPR-40) for the Fort Calhoun Station, Unit No. 1 (FCS). The requested changes would relocate snubber operability requirements to the Updated Safety Analysis Report (USAR) and incorporate snubber examination and testing requirements into TS Section 3.3.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include TS as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TS to licensee-controlled documents, consistent with the standard enunciated in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety."

Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether a particular matter is required to be included in the TS. These criteria were subsequently incorporated into the regulations by an amendment to 10 CFR 50.36, 60 CFR 36953 (July 19, 1995). The criteria incorporated into the rule are as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. As a result, existing LCO requirements which fall within or satisfy any of the criteria must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other licensee-controlled documents.

Section 50.55a, "Codes and Standards," of Title 10 of the Code of Federal Regulations specifies Inservice Inspection (ISI) requirements. Section XI of the ASME Code (the code) is incorporated by reference as the requirements for ISI. The current 10-year interval for the FCS ISI program began September 26, 1993, and is based on the requirements of the 1989 Edition of Section XI of the ASME Code.

The April 7, 1995, revision of the CEQG STS (NUREG-1432, Rev. 1) "Standard Technical Specifications (STS) - Combustion Engineering Plants," relocated some ISI requirements to the administrative controls section of the TS and deleted a portion of the ISI requirements, retaining the reactor coolant pump (RCP) flywheel inspections in the administrative control section.

### 3.0 EVALUATION

The licensee's proposed changes would relocate TS Limiting Conditions for Operation (LCO) 2.18 and Surveillance Requirements (SR) 3.14 in accordance with the Commission's Final Policy Statement for relocation of current TS that do not meet the screening criteria for retention. The proposed changes would delete Sections 2.18 and 3.14 "Shock Suppressors (Snubbers)," from the LCO and SR chapters, respectively. The proposed change to Section 3.3 would revise the ISI commitments in the TS by incorporating snubbers. Additionally, the change would delete the reference to Section 2.18 in Section 5.10.2.m regarding record retention for snubbers.

The existing "Shock Suppressor (Snubbers)" TS 2.18 states that all safety-related snubbers shall be operable. Snubbers are passive devices used for supporting piping systems. The associated TS action statement requires that an inoperable snubber be replaced or repaired within 72 hours because snubber protection is needed only during low probability events. The existing

requirements that all snubbers be operable are requirements that do not impact reactor operation, do not identify a parameter that is an initial condition assumption for a DBA or transient, do not identify a significant abnormal degradation of the reactor coolant pressure boundary, do not form part of the primary success path which functions or actuates to mitigate a design basis accident or transient, and has not been demonstrated from operating experience to be significant to public health and safety. The provisions will be relocated to the USAR and controlled by 10 CFR 50.59.

The existing "Shock Suppressor (Snubbers)" TS 3.14 provides visual and functional testing requirements (surveillance requirements) for snubbers to be periodically performed on a refueling frequency. Snubbers are required to be examined and tested in accordance with ASME Section XI, except where specific written relief is granted by the NRC. Adding the verbiage "including applicable supports" to TS Section 3.3 incorporates all snubber examination testing requirements into the Section XI ISI program as required by 10 CFR 50.55a. The snubber surveillance requirements of TS 3.14, therefore, would be redundant to those of TS 3.3 and are not necessary.

The existing "Record Retention" TS 5.10.2.m contains a reference to provisions of TS 2.18 for retaining records of the service life for all snubbers. The proposed change would be to delete the reference consistent with the deletion of TS 2.18.

In conclusion, these relocated snubber operability requirements are not required to be in the TS under 10 CFR 50.36 or § 182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, they do not fall within any of the four criteria set forth in the Commission's Final Policy Statement and subsequently incorporated into 10 CFR 50.36. Additionally, the staff finds that sufficient regulatory controls exist under 10 CFR 50.59. Accordingly, the staff has concluded that these requirements may be relocated from the TS to the licensee's USAR.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Nebraska State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards

44360). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: September 27, 1996