

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization (Continued)

- b. An Operator or Technician qualified in Radiation Protection Procedures shall be onsite when fuel is in the reactor.
- c. All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling who has no other concurrent responsibilities during the operation.
- d. Fire protection program responsibilities are assigned to those positions and/or groups designated by asterisks in USAR 12.1-1 through 12.1-4 according to the procedures specified in Section 5.8 of the Technical Specifications.
- e. Administrative procedures shall be developed and implemented to limit the working hours of plant staff who perform safety-related functions. Administrative procedures shall reflect the personnel whose working hours will be affected.

Shift coverage shall be maintained without routine heavy use of overtime. ~~The objective shall be to have operating personnel work a normal 8 hour day, 40 hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modifications, on a temporary basis, the guidelines identified in the administrative procedures shall be followed.~~

Deviations from the guidelines shall be authorized in advance by the Department Manager, ~~Plant Manager - Fort Calhoun Station~~, or their designated alternates, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Routine deviation from the administrative guidelines shall not be authorized.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Department Manager, ~~Manager - Fort Calhoun Station~~, or their designated alternates, or higher levels of management, to ensure that excessive hours have not been assigned.

- f. The Supervisor - Operations, the Shift Supervisors and Licensed Senior Operators shall hold a senior reactor operator license. The Licensed Operators shall hold a reactor operator license.

ADMINISTRATIVE CONTROLSResponsibilities

5.5.1.6

The Plant Review Committee shall be responsible for:

- a. Review of (1) Administrative Controls Standing Orders and changes thereto, (2) procedures required by Specification 5.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to procedures required by Specification 5.8 and requiring a 10 CFR 50.59 safety evaluation;
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes to the Core Operating Limits Report.
- e. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- f. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the ~~Division Manager - Nuclear Operations~~ Vice President and to the Chairperson of the Safety Audit and Review Committee.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews and investigations and reports thereon as requested by the Chairperson of the Safety Audit and Review Committee.
- i. DELETED
- j. DELETED
- k. Review of the Fire Protection Program Plan and shall submit changes to the Chairperson of the Safety Audit and Review Committee.
- l. Review of all Reportable Events.

Authority

5.5.1.7

The Plant Review Committee shall:

- a. Recommend in writing to the Manager - Fort Calhoun Station approval or disapproval of items considered under 5.5.1.6(a) through (e) above.

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- 5.5.1.7 b. Render determinations in writing with regard to whether or not each item considered under 5.5.1.6(b) through (f) above constitutes an unreviewed safety question.

- c. Provide immediate written notification to the ~~Division Manager—Nuclear Operations Vice President~~ and the Chairperson of the Safety Audit and Review Committee of disagreement between the Plant Review Committee and the Manager - Fort Calhoun Station; however, the Manager - Fort Calhoun Station shall have responsibility for resolution of such disagreements pursuant to 5.1.1 above.

Records

- 5.5.1.8 The Plant Review Committee shall maintain written minutes of each meeting and copies shall be provided to the ~~Division Manager—Nuclear Operations Vice President~~ and Chairperson of the Safety Audit and Review Committee.

5.5.2 Safety Audit and Review Committee (SARC)

Function

- 5.5.2.1 The Safety Audit and Review Committee shall function to provide the independent review and audit of designated activities in the areas of:

- a. nuclear power plant operation
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance
- i. fire protection

Composition

- 5.5.2.2 The Safety Audit and Review Committee shall be composed of:

- Chairperson: ~~Senior Vice President~~ Member as appointed by the Vice President
- Member: ~~Vice President~~
- Member: Division Manager - Nuclear Services Assessments
- Member: ~~Division Manager—Nuclear Operations~~
- Member: Division Manager - ~~Production Engineering~~ Engineering & Operations Support
- Member: Manager - Fort Calhoun Station
- Member: Other qualified OPPD personnel and/or consultants as required and as determined by the SARC Chairperson

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5.6 Reportable Event Action

5.6.1 The following actions shall be taken in the event of a REPORTABLE EVENT:

- a. The Commission shall be notified pursuant to the requirements of 10 CFR 50.72, if applicable.
- b. Each Reportable Event shall be reviewed by the Plant Review Committee and submitted to the Chairperson of the Safety Audit and Review Committee and the ~~Division Manager~~ Nuclear Operations Vice President.
- c. Submit reports of Reportable Events pursuant to the requirements of Specification 5.9.2.

5.7 Safety Limit Violation

5.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The unit shall be placed in at least HOT SHUTDOWN within 1 hour.
- b. The Safety Limit Violations shall be reported to the ~~Division Manager~~ Nuclear Operations Vice President and the Chairperson of the Safety Audit and Review Committee (SARC) within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Plant Review Committee. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the ~~Chairperson of the Safety Audit and Review Committee and the Division Manager~~ Nuclear Operations Vice President within 14 days of the violation.

5.8 Procedures

5.8.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the minimum requirements of sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of USNRC Regulatory Guide 1.33 except as provided in 5.8.2 and 5.8.3 below.

5.8.2 Each procedure of Specification 5.8.1, and changes thereto, and any other procedure or procedure change that the Manager - Fort Calhoun Station determines to affect nuclear safety, shall be reviewed and approved as described below, prior to implementation.

U.S. Nuclear Regulatory Commission
LIC-97-0018

ATTACHMENT B

DISCUSSION, JUSTIFICATION AND NO SIGNIFICANT HAZARDS CONSIDERATIONS

DISCUSSION AND JUSTIFICATION:

Omaha Public Power District (OPPD), the licensee for Fort Calhoun Station (FCS), Unit No. 1, proposes to amend Operating License No. DPR-40 and the Technical Specifications (TS) contained in Appendix A therein as follows:

Paragraph 3.D, Spent Fuel Pool Modification

Paragraph 3.D of Facility Operating License No. DPR-40, is proposed for deletion (Paragraphs 3.E and 3.F will be renumbered to 3.D and 3.E respectively). Paragraph 3.D describes the modification that increased the spent fuel pool storage capacity and states that the applicable Specifications will be effective when the last new rack is installed. As stated in OPPD's letter to the NRC dated August 12, 1994 (LIC-94-0167), the last new storage rack was installed on August 8, 1994. Since the applicable Specifications have been effective since then, the current Paragraph 3.D is no longer necessary. Therefore, Paragraph 3.D should be removed from the License and Paragraphs 3.E and 3.F renumbered to 3.D and 3.E, respectively.

Technical Specifications, Table of Contents

Table of Contents, Section 6.0, "Interim Special Technical Specifications," Subsections 6.1 through 6.4 are proposed for deletion. As shown on page 6-1 of the FCS Unit No. 1 Technical Specifications, all of the interim specifications have been deleted by previous Amendments. Therefore, this proposed revision will update the Table of Contents accordingly.

TS 2.15, Tables 2-3 & 2-4

Item 2C of Table 2-3 and Item 1C of Table 2-4 currently list the description of the Functional Unit as "Pressurizer Low/Low." OPPD proposes to correct the description to the proper terminology which is "Pressurizer Low/Low Pressure."

TS 5.2, Organization

Technical Specification 5.2, Item e, provides limitations on the work hours of plant personnel performing safety related functions. In lieu of the current guidance contained in Item e, OPPD proposes to delete the specific working hours as stated and relocate these requirements to the Updated Safety Analysis Report (USAR). Overtime will remain controlled by plant administrative procedures with the USAR generally following the guidance of the NRC's Policy Statement on working hours contained in Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours." Deviations from the guidelines will continue to be authorized by the Manager - Fort Calhoun Station or designees (Department Managers or designated alternates or high levels of management).

DISCUSSION AND JUSTIFICATION (CONTINUED):

An additional requirement is proposed such that working hours be reviewed monthly by these designated individuals to ensure that excessive hours are not assigned.

Specifying personnel working hours in TS does not meet any of the four criteria contained in 10 CFR 50.36 for inclusion in the TS. Revisions to plant procedures containing these requirements are required to be evaluated in accordance with 10 CFR 50.59. The proposed relocation is similar to recent Amendments issued to the Davis-Besse Nuclear Power Station and the San Onofre Nuclear Generating Station.

TS 5.5. Composition of the Safety Audit and Review Committee

Technical Specification 5.5.2.2 states the composition of the Safety Audit and Review Committee and states that the Chairperson is the Senior Vice President. It is proposed that the specific title of the Chairperson be deleted and replaced with "Member as appointed by the Vice President." This will allow the flexibility to change chairmanship of the committee amongst the members.

TS 5.3. Facility Staff Qualification

TS 5.5. Review and Audit

TS 5.6. Reportable Event Actions

TS 5.7. Safety Limit Violation

TS 5.11. Radiation Protection Program

During a recent reorganization of OPPD's Nuclear Operations Division, the position of Supervisor - Radiation Protection was upgraded to Manager - Radiation Protection. As a result, TS 5.3.1 and 5.11 references to "Supervisor - Radiation Protection" must be changed to "Manager - Radiation Protection." In addition, an editorial change to add an apostrophe to "bachelor's" degree is proposed for TS 5.3.1.

Additional organizational changes will delete the position of Division Manager - Nuclear Operations, rename the Division Manager - Nuclear Services to Division Manager - Nuclear Assessments, and rename the Division Manager - Production Engineering to Division Manager - Engineering & Operations Support. Therefore, these titles are proposed for revision. The reporting responsibility of the Manager - Fort Calhoun Station will also be changed to report directly to the Vice President. Therefore it is proposed that notifications and reports previously submitted to the Division Manager - Nuclear Operations be submitted to the Vice President.

DISCUSSION AND JUSTIFICATION (CONTINUED):

TS 5.10 Record Retention

Technical Specification 5.10 must be revised to comply with recent changes to 10 CFR 20 that require records of radioactive shipments to be retained until license termination. Therefore, OPPD proposes to remove the requirement from TS 5.10.1g (5 year retention) and place it in TS 5.10.2 (duration of the Facility Operating License retention). OPPD is in compliance with the requirements of 10 CFR 20 as applicable FCS procedures list the correct retention period for radiation protection documentation. The Section 5.0 title is inserted at the top of page 5-18 from which it is currently missing. Thus, these are administrative changes designed to update the FCS Unit No. 1 TS to reflect current regulatory and procedural requirements and correct a minor format discrepancy.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATIONS:

The proposed Technical Specification (TS) changes do not involve significant hazards considerations because operation of Fort. Calhoun Station (FCS) 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 changes requested are administrative in nature. Paragraph 3.D was placed in the License by Amendment No. 155 to authorize Omaha Public Power District (OPPD) to increase the storage capacity of the FCS spent fuel pool. Amendment No. 155 stated that the TS as issued would be effective when the last new rack was installed. Since the last new rack was installed on August 8, 1994, Paragraph 3.D is no longer necessary and should be deleted from the License.

Table of Contents, Section 6.0, "Interim Special Technical Specifications," Subsections 6.1 through 6.4 are proposed for deletion because all of the Specifications referred to have been deleted by previous Amendments.

The revision proposed for TS 2.15 (Item 2C of Table 2-3 & Item 1C of Table 2-4) will insert the correct terminology (Pressurizer Low/Low Pressure) into the Functional Unit description.

The revision proposed for TS 5.2 will delete the specific working hours as stated and relocate these requirements to the Updated Safety Analysis Report (USAR). Overtime will remain controlled by plant administrative procedures with the USAR generally following the guidance of the NRC's Policy Statement on working hours contained in Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours." Specifying personnel working hours in TS does not meet any of the four criteria contained in 10 CFR 50.36 for inclusion in the TS. Revisions to plant procedures containing these requirements are required to be evaluated in accordance with 10 CFR 50.59. The proposed relocation is similar to recent Amendments issued to the Davis-Besse Nuclear Power Station and the San Onofre Nuclear Generating Station.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATIONS (CONTINUED):

The revision proposed for TS 5.5.2.2 will replace the specific title of the Chairperson of the Safety Audit and Review Committee and replace it with "Member as appointed by the Vice President." This will allow the flexibility to change chairmanship of the committee amongst the members.

The revisions proposed to TS 5.3, 5.5, 5.6, 5.7, and 5.11 revise position titles and reporting responsibilities to reflect organizational changes. Qualifications for individuals in these positions meet or exceed the previous requirements.

The revision to TS 5.10 concerning retention of records of radioactive shipments will update the TS to current 10 CFR 20 requirements. Plant procedures already comply with current 10 CFR 20 record retention requirements. The addition of the Section 5.0 title corrects a minor format discrepancy.

These proposed revisions are administrative in nature. The proposed revisions have no effect on any initial assumptions or operating restrictions assumed in any accident, nor do these changes have any effect on equipment required to mitigate the consequences of an accident. Therefore the proposed revisions do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed revisions correct minor errors, remove outdated information, are consistent with changes in organizational structure, 10 CFR Part 20, or the criteria contained in 10 CFR 50.36. These changes will not result in any physical alterations to the plant configuration, changes to setpoint values, or changes to the application of setpoints or limits. No new operating modes are proposed as a result of these changes. Therefore the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATIONS (CONTINUED):

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

The revisions listed above correct minor errors, remove outdated information, or are consistent with changes in organizational structure, 10 CFR Part 20, or the criteria contained in 10 CFR 50.36. These changes will not result in any physical alterations to the plant configuration, changes to setpoint values, or changes to the application of setpoints or limits. Therefore the proposed changes do not involve a significant reduction in a margin of safety.

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. The proposed changes will not result in a condition that 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(c)(9), and pursuant to 10 CFR 51.22(b) no environmental assessment need be prepared.