



December 29, 1999
LIC-99-0125

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

- References:
1. Docket No. 50-285
 2. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated October 26, 1998 (LIC-98-0133)
 3. NUREG-0800, SRP 6.5.2, "Containment Spray as a Fission Product Cleanup System," Rev. 2, December 1988
 4. Draft Guide DG-1081, "Alternative Radiological Source Terms for Evaluating the Radiological Consequences of Design Basis Accidents at Boiling and Pressurized Water Reactors"
 5. NRC Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999
 6. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated August 2, 1999 (LIC-99-0068)
 7. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated October 8, 1999 (LIC-99-0091)
 8. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated November 29, 1999 (LIC-99-0114)

SUBJECT: Generic Letter 99-02 Revised Detailed Project Plan

In Reference 6, Omaha Public Power District (OPPD) provided a response to the Requested Actions outlined in the Reference 5 Generic Letter (GL). This response for Fort Calhoun Station (FCS) included an alternate course of action and its basis, the schedule for submitting the detailed project plan to implement the proposed course of action for NRC staff review, and the basis for continued operability of affected systems. Reference 8 provided the detailed GL 99-02 project plan to address required maintenance and testing of each applicable activated charcoal unit at FCS and the schedule for submitting any required license amendment requests. This plan was discussed with the NRC Staff during a video conference call on December 6, 1999. Because the proposed plan schedule was unacceptable to the NRC Staff, OPPD representatives agreed to evaluate revision of the plan schedule. OPPD has subsequently developed a revised project plan as contained in this letter. Therefore, this letter supersedes the project plan contained in the Reference 8 letter.

OPPD has previously discussed with the NRC Staff the relationship between the upgrade of the FCS radiological consequences analyses and compliance with GL 99-02. The upgrade program was described in Licensee Event Report 1998-013 (Reference 2) and at a meeting with the NRC staff on January 14, 1999. Therefore, the GL 99-02 Project Plan Activity Schedule (see Attachment 1) includes all related activities.

In accordance with the revised Project Plan, OPPD will submit an application for license amendment by March 17, 2000 to revise applicable FCS Technical Specifications in accordance with GL 99-02. These proposed changes will specify the test efficiency and require the use of the ASTM D3803-1989 methodology when testing credited ESF charcoal filter media. In addition, the proposal will remove credit for the Containment Air Cooling and Filtering Charcoal Filters (VA-6A/B) and take credit for the Containment Spray System as a fission product cleanup system in accordance with SRP 6.5.2.

Until NRC approval of the proposed license amendment, maintenance and testing of activated charcoal units at FCS will continue to be conducted in accordance with the requirements and methodologies specified in applicable Technical Specifications. Justification for continued operability of affected charcoal systems was provided in OPPD's Supplemental Response to Generic Letter 99-02 (Reference 7). The Control Room charcoal filter units have been tested utilizing the method prescribed in ASTM D3803-1989. Measured efficiencies from these tests demonstrate compliance with Technical Specifications efficiency requirements.

OPPD will also complete the revision of the FCS accident-based radiological consequence analyses as part of a comprehensive radiological consequences upgrade program. The analyses will incorporate three primary changes to the current FCS design basis:

1. Remove credit for the Containment Air Cooling and Filtering Charcoal Filters (VA-6A/B)
2. Take credit for the Containment Spray System as a fission product cleanup system in accordance with SRP 6.5.2 (Reference 3)
3. Model 100 scfm of Control Room unfiltered in-leakage for applicable accidents. (This analyzed in-leakage may change as a result of unfiltered in-leakage data from recently completed tracer gas testing. The final tracer gas test report from Lagus Applied Technology, Inc. is expected on January 5, 2000.)

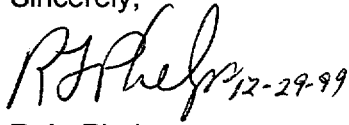
OPPD is also continuing to evaluate use of the alternate source term in accordance with DG-1081. OPPD plans completion of the accident-based radiological consequence analyses by September 1, 2000.

Finally, OPPD anticipates that the revised analyses, while maintaining acceptable results, may represent increases to certain radiological consequences currently reported in the FCS Updated Safety Analysis Report, and thus may require NRC approval pursuant to 10 CFR 50.59. Also, these revised analyses may require supplementing or clarifying the bases and justifications for the Technical Specification changes submitted in accordance with GL 99-02. If necessary, OPPD will submit a license amendment request to comply with 10 CFR 50.59 by October 27, 2000.

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Please contact me if you have any questions.

Sincerely,

Handwritten signature of R. L. Phelps in black ink, with the date 12-29-99 written in the lower right of the signature.

R. L. Phelps
Division Manager
Nuclear Engineering

CBS/tcm

Attachment

c: E. W. Merschoff, NRC Regional Administrator, Region IV
L. R. Wharton, NRC Project Manager
W. C. Walker, NRC Senior Resident Inspector
Winston & Strawn

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ATTACHMENT 1

Generic Letter 99-02 Project Plan Activity Schedule

Task	Completion Date
GL 99-02 License Amendment Request	March 17, 2000
Prepare and submit License Amendment Request in accordance with GL 99-02 for NRC review and approval	
Revise Radiological Consequence Analyses	September 1, 2000
Radiological Source Term Calculations (core inventory, RCS activity concentrations, secondary coolant design and Tech Spec source terms, iodine spike source terms) (3 calcs) (Complete)	
Containment Spray Coverage and Containment Mixing Calculations (2 calcs) (Complete)	
Complete testing and calculation of actual unfiltered leakage into Control Room envelope	
Revise Iodine Removal Coefficient Calculations in accordance with DG-1081 (3 calcs)	
Atmospheric Dispersion Factor Calculations (3 calcs) (Complete)	
GDT / Liquid Waste Source Terms (2 calcs) (Complete)	
LOCA/ Hydrogen Purge (7 calcs)	
MSLB, SGTR, Seized Rotor (3 calcs)	
FHAs / RV Head Drop (2 calcs)	
CEA Ejection / GDT / Liquid Waste Release (3 calcs)	
Final Calculation Package (28 calcs)	
If necessary, submit License Amendment Request to comply with 10 CFR 50.59	October 27, 2000