Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247

March 15, 2000
LIC-00-0023

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)
9. Letter from OPPD (R. L. Phelps) to NRC (Document Control Desk) dated December 29, 1999 (LIC-99-0125)

SUBJECT: Revision of Submittal Date for License Amendment Request Associated with Generic Letter 99-02

In Reference 9, Omaha Public Power District (OPPD) provided a revised Generic Letter 99-02 Project Plan. In that letter, OPPD committed to 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.

A081

During internal review and approval of the application for license amendment, OPPD initiated communications with the NRC Staff concerning the appropriate Allowed Outage Time (AOT) for the Containment Spray pumps. OPPD's intent was not to revise the current FCS Technical Specification AOT of 7 days for an inoperable Containment Spray pump; however, the Standard Technical Specifications for Combustion Engineering plants have a 72-hour AOT for an inoperable Containment Spray train credited for iodine removal. During a conference call held on March 14, 2000, OPPD and NRC representatives discussed differences between the FCS Containment Spray system and the system assumed in the Standard Technical Specifications. The participants agreed that OPPD would include a similar discussion in the application for license amendment. The participants also agreed on a revised submittal date of April 14, 2000 for the application in order to allow incorporation of the necessary discussion.

Please contact me if you have any questions.

Sincerely,

S. K. Gambhir
Division Manager
Nuclear Operations

TCM/tcm

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

Attachment 2 - Action Statement Approval Form

Action No.: 1	Initiating Document (CR, LER, LIC, etc.): LIC-99-0125

Action (quoted): During a conference call held on March 14, 2000, OPPD and NRC representatives discussed differences between the FCS containment spray system and the system assumed in the Standard Technical Specifications. The participants agreed that OPPD would include a similar discussion in the application for license amendment. The participants also agreed on a revised submittal date of April 14, 2000 for the application in order to allow incorporation of the necessary discussion.

Implementing Documents	Section	Date	Rev. No.	Page

Accomplished by existing ~~CATS~~ CR item? Y N	~~CID~~ CR No.: 20000053
Ongoing Commitment? Y N	CID No.:
Initiator: T. C. Matthews	Date: 3/14/00
Initiating Department/No.: 810	Due Date:

Responsible Department Approval

Comments:

MR/EAR/PMO MWO/etc. No.:

Y N

M/Hr	Budgeted $	Non-Budgeted $	Total Cost $	Planned

Responsible Dept/No. Manager Approval * RJ Phelps Date 3-14-00

NL

Comment Coordinator: T. C. Matthews	Included in Letter? Y N

Agency: NRC	LIC-00-0023	Commitment Date: 4/14/00

Comments:

*cc: (w/o att) Lic Eng - CATS, Mgr NP