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September 8, 2004
LIC-04-0076

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Reference: Docket No. 50-285

**SUBJECT: Fort Calhoun Station Unit No. 1 License Amendment Request,
"Application For Technical Specification Improvement to Eliminate
Requirements For Hydrogen Monitors Using the Consolidated Line Item
Improvement Process"**

Pursuant to 10 CFR 50.90, Omaha Public Power District (OPPD) hereby proposes to make changes to the Fort Calhoun Station (FCS) Technical Specifications (TS).

The proposed amendment will delete the TS requirements related to hydrogen monitors in TS Table 2-10 Item 4 and TS Table 3-3 Item 26. The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on September 16, 2003. The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications and commitments. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides revised, clean TS pages. Implementation of TSTF-447 also involves various changes to the TS Bases. The TS Bases changes will be submitted with a future update in accordance with TS 5.20, "Technical Specifications (TS) Bases Control Program."

OPPD requests approval of the proposed amendment by April 15, 2005. OPPD requests 120 days to implement this amendment. The following commitment is made to the NRC in this letter:

- OPPD has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at FCS and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be maintained as non-safety-related equipment and they shall be included in the Updated Safety Analysis Report (USAR). This regulatory commitment will be completed by the implementation date.

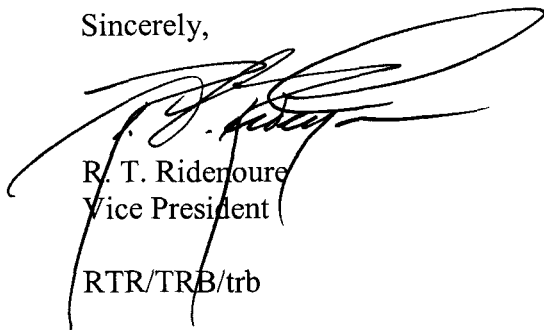
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In accordance with 10 CFR 50.91, a copy of this application is being submitted to the designated Nebraska State Official.

I declare under penalty of perjury that the foregoing is true and correct. (Executed on September 8, 2004)

If you have any questions or require additional information, please contact Thomas R. Byrne at (402) 533-7368.

Sincerely,



R. T. Riderjoure
Vice President
RTR/TRB/trb

Attachments:

1. Omaha Public Power District Evaluation
 2. Markup of Technical Specification Pages
 3. Proposed Technical Specifications (clean)
- c: Division Administrator - Public Health Assurance, State of Nebraska

ATTACHMENT 1

Omaha Public Power District Evaluation for Amendment of Operating License

- 1.0 INTRODUCTION
 - 2.0 DESCRIPTION OF PROPOSED AMENDMENT
 - 3.0 BACKGROUND
 - 4.0 REGULATORY REQUIREMENTS & GUIDANCE
 - 5.0 TECHNICAL ANALYSIS
 - 6.0 REGULATORY ANALYSIS
 - 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)
 - 8.0 ENVIRONMENTAL CONSIDERATION
 - 9.0 PRECEDENCE
 - 10.0 REFERENCES
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Omaha Public Power District Evaluation For Amendment of Operating License

1.0 INTRODUCTION

The proposed License amendment deletes Technical Specification (TS) TS Table 2-10, Item 4 and TS Table 3-3, Item 26 related to hydrogen monitors for Fort Calhoun Station Unit No. 1 (FCS). The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on September 16, 2003.

The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-447, the proposed TS changes include:

- TS Table 2-10, Item 4 – Deleted
- TS Table 3-3, Item 26 – Deleted

No changes to the FCS TS Bases are required to implement these changes.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

5.0 TECHNICAL ANALYSIS

The Omaha Public Power District (OPPD) has reviewed the safety evaluation (SE) published on September 25, 2003 (68 FR 55416) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE, as well as the supporting information provided to support TSTF-447. OPPD has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to FCS and justify this amendment for the incorporation of the changes to the FCS TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on September 25, 2003 (68 FR 5416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register on September 25, 2003 (68 FR 55416) for this TS improvement, OPPD is making the following verifications and regulatory commitments:

1. OPPD has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at FCS and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be maintained as non-safety-related equipment and they shall be included in the Updated Safety Analysis Report (USAR). This regulatory commitment will be completed by the implementation date.
2. FCS does not have an inerted containment.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

OPPD has reviewed the proposed no significant hazards consideration determination published on September 25, 2003 (68 FR 55416) as part of the CLIIP. OPPD has concluded that the proposed determination presented in the notice is applicable to FCS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

9.0 ENVIRONMENTAL EVALUATION

OPPD has reviewed the environmental evaluation included in the model SE published on September 25, 2003 (68 FR 55416) as part of the CLIIP. OPPD has concluded that the staff's findings presented in that evaluation are applicable to FCS and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. OPPD is not proposing variations or deviations from the TS changes described in TSTF-447 or the NRC staff's model SE published on September 25, 2003 (68 FR 55416).

10.0 REFERENCES

- 10.1** Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement to Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process, published September 25, 2003, (68 FR 55416).

ATTACHMENT 2

Markup of Technical Specification Pages

TECHNICAL SPECIFICATIONS

TABLE 2-10

Post-Accident Monitoring Instrumentation Operating Limits

<u>Instrument</u>	<u>Minimum Operable Channels</u>	<u>Action</u>
1. Containment Wide Range Radiation Monitors (RM-091A & B)	2	(a)
2. Wide Range Noble Gas Stack Monitor RM-063 (Noble Gas Portion Only)	1	(a)
3. Main Steam Line Radiation Monitor (RM-064)	1	(a)
4. Not Used Containment Hydrogen Monitor (VA-81A & B)	2	(b)(c)
5. Containment Water Level Narrow Range (LT-599 & LT-600)	1	(d)
Wide Range (LT-387 & LT-388)	2	(b)(c)
6. Containment Wide Range Pressure	2	(b)(c)
7. Reactor Coolant System Subcooled Margin Monitor	2	(e)(f)
8. Core Exit Thermocouples (i)	2/Core Quadrant	(g)(h)
9. Reactor Vessel Level (HJTC) (j)	2	(k)(l)
<p>(a) With the number of OPERABLE channels less than required by the minimum channels operable requirements, initiate the pre-planned alternate method of monitoring the appropriate parameter(s) within 72 hours, and</p> <ol style="list-style-type: none"> 1. either restore the inoperable channel(s) to OPERABLE status within 7 days of the event, or 2. prepare and submit a special report to the Commission pursuant to specification 5.9.3 within 14 days following the event outlining the action taken, the cause of the inoperability, and the plans and schedules for restoring the system to OPERABLE status. <p>(b) With one channel inoperable, restore the inoperable monitor to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours.</p>		

TECHNICAL SPECIFICATIONS

TABLE 3-3 (Continued)

**MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TESTING
OF MISCELLANEOUS INSTRUMENTATION AND CONTROLS**

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
25. Containment Purge Isolation Valves (PCV-742A, B, C, & D)	a. Check	M	a. Verify valve position using control room indication.
26. Not Used Containment Hydrogen Monitors (VA-81A&B)	a. Check	M	a. CHANNEL CHECK
	b. Test	Q	b. Calibrate span/zero using sample gas and check flow rates.
	c. Calibrate	R	c. CHANNEL CALIBRATION
27. Containment Water Level Narrow Range (LT-599 & LT-600)	a. Check	M	a. CHANNEL CHECK
	b. Calibrate	R	b. CHANNEL CALIBRATION
Wide Range (LT-387 & LT-388)	a. Check	M	a. CHANNEL CHECK
	b. Calibrate	R	b. CHANNEL CALIBRATION
28. Containment Wide Range Pressure Indication	a. Check	M	a. CHANNEL CHECK
	b. Calibrate	R	b. CHANNEL CALIBRATION
29. Toxic Gas Detectors: YIS-6287A&B (NH ₃)	a. Check	S	a. Comparison of readings from redundant channels.
	b. Calibrate	Q	b. Gas calibration.

ATTACHMENT 3

Proposed Technical Specification Pages (clean)

TABLE 2-10

Post-Accident Monitoring Instrumentation Operating Limits

<u>Instrument</u>	<u>Minimum Operable Channels</u>	<u>Action</u>
1. Containment Wide Range Radiation Monitors (RM-091A & B)	2	(a)
2. Wide Range Noble Gas Stack Monitor RM-063 (Noble Gas Portion Only)	1	(a)
3. Main Steam Line Radiation Monitor (RM-064)	1	(a)
4. Not Used		
5. Containment Water Level Narrow Range (LT-599 & LT-600) Wide Range (LT-387 & LT-388)	1 2	(d) (b)(c)
6. Containment Wide Range Pressure	2	(b)(c)
7. Reactor Coolant System Subcooled Margin Monitor	2	(e)(f)
8. Core Exit Thermocouples (i)	2/Core Quadrant	(g)(h)
9. Reactor Vessel Level (HJTC) (j)	2	(k)(l)
(a) With the number of OPERABLE channels less than required by the minimum channels operable requirements, initiate the pre-planned alternate method of monitoring the appropriate parameter(s) within 72 hours, and		
1. either restore the inoperable channel(s) to OPERABLE status within 7 days of the event, or		
2. prepare and submit a special report to the Commission pursuant to specification 5.9.3 within 14 days following the event outlining the action taken, the cause of the inoperability, and the plans and schedules for restoring the system to OPERABLE status.		
(b) With one channel inoperable, restore the inoperable monitor to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours.		

TABLE 3-3 (Continued)

**MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TESTING
OF MISCELLANEOUS INSTRUMENTATION AND CONTROLS**

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
25. Containment Purge Isolation Valves (PCV-742A, B, C, & D)	a. Check	M	a. Verify valve position using control room indication.
26. Not Used			
27. Containment Water Level Narrow Range (LT-599 & LT-600) Wide Range (LT-387 & LT-388)	a. Check	M	a. CHANNEL CHECK
	b. Calibrate	R	b. CHANNEL CALIBRATION
	a. Check	M	a. CHANNEL CHECK
	b. Calibrate	R	b. CHANNEL CALIBRATION
28. Containment Wide Range Pressure Indication	a. Check	M	a. CHANNEL CHECK
	b. Calibrate	R	b. CHANNEL CALIBRATION
29. Toxic Gas Detectors: YIS-6287A&B (NH ₃)	a. Check	S	a. Comparison of readings from redundant channels.
	b. Calibrate	Q	b. Gas calibration.