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NRC Project Director: William H. Bateman

Omaha Public Power District, Docket No. 50-285, Fort Calhoun Station,Unit No. 1, Washington County, Nebraska

Date of amendment request: June 27, 1995

Description of amendment request: This proposed amendment would revise Technical Specification 2.2 on the chemical and volume control system to reformat, clarify the requirements, and be more consistent with Combustion Engineering Standard Technical Specifications (STS) as presented in NUREG-0212, Revision 2.

Basis for proposed no significant hazards consideration determination:As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes incorporate required actions, restrictions, and surveillance requirements for the Chemical and Volume Control System (CVCS) similar to Combustion Engineering Standard Technical Specifications (NUREG-0212 Revision 2).

Technical Specification (TS) 2.2(1) specifies the requirements for borated water sources and flow paths when the reactor is subcritical and fuel is in the reactor. In order for a flow path to be operable, a charging or high pressure safety injection pump is required to be operable to inject the boric acid solution into the Reactor Coolant System. Currently this specification does not state any operability requirements for boric acid transfer pumps, charging pumps or high pressure safety injection pumps. In addition, this specification does not state any required actions to be taken if the borated water source or flow path is not operable.

Therefore, the proposed changes incorporate requirements for the CVCS during shutdown into separate Limiting Conditions for Operations (LCOs) that will address the requirements for borated water sources, boric acid flow paths, charging pumps, and boric acid transfer pumps.

The proposed changes delete operability and surveillance requirements for level instrumentation on the boric acid storage tanks. Level instrumentation by itself does not fulfill a safety function. The proposed changes will still require verification of tank level.

Additionally, level instrumentation on the boric acid storage tanks does not meet any of the four criteria for inclusion into Technical Specifications as presented in the Final Policy Statement on Technical Specifications Improvements. This instrumentation is not installed instrumentation used to detect a significant degradation of the RCS boundary, a design feature or operating restriction that is an initial condition of a Design Basis Accident, a component that is part of the primary success path or actuates to mitigate a DBA, nor is it a component that has been shown to be significant to public health and safety. Therefore, testing and maintenance of the level instrumentation will be controlled outside of the TS.

TS 2.2(3) specifies the Modifications of Minimum Requirements that are allowed during Power Operation. This specification is inconsistent with TS 2.2(2) which states the minimum requirements and is incomplete as it does not address components during Modes 3, 4, and 5. The proposed changes incorporates consistent allowed outage times for the various components, and additional required actions for component inoperability during Modes 4 and 5 when fuel is in the reactor.

The proposed changes incorporate additional operability requirements for the CVCS and required actions to be taken for CVCS component inoperability during Modes 4 and 5 when fuel is in the reactor. The proposed changes delete inconsistencies and clarify operability requirements for the CVCS whenever the reactor coolant temperature (T_{cold}) is greater than or equal to 210 degrees F, and ensures that operation of the system is consistent with its design bases. The proposed changes also revise the allowed outage time for CVCS components from 24 hours to 72 hours based on Standard Technical Specifications. This change is insignificant based on the FCS plant specific probabilistic risk assessment. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

There will be no physical alterations to the plant configuration, changes to setpoint values, or changes to the implementation of setpoints or limits as a result of this proposed change. No new modes of operation are proposed. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously analyzed.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed changes incorporate additional operability requirements, delete inconsistencies, and clarify operability requirements for the CVCS to ensure that operation of the system is consistent with its design bases. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: W. Dale Clark Library, 215 South 15th Street, Omaha, Nebraska 68102

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Omaha Public Power District, Docket No. 50-285, Fort Calhoun Station, Unit No. 1, Washington County, Nebraska

Date of amendment request: July 11, 1995

Description of amendment request: The proposed amendment would allow up to 24 hours to restore Safety Injection Tank (SIT) operability if the SIT is inoperable due to level and/or pressure outside prescribed limits or if the associated isolation valve is in other than the full open position. The proposed change would also allow up to 72 hours to restore SIT operability if the SIT is inoperable due to boron concentration outside prescribed limits.

Basis for proposed no significant hazards consideration determination:As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The safety injection tanks (SITs) are passive components in the emergency core cooling system. The SITs are not an accident initiator in any accident previously evaluated. Therefore, this change does not involve an increase in the probability of an accident previously evaluated.

SITs were designed to mitigate the consequences of a loss of coolant accident (LOCA). These proposed changes do not affect any of the assumptions used in deterministic LOCA analysis. Hence the consequences of accidents previously evaluated do not change.

In order to fully evaluate the affect of the SIT allowable outage time (AOT) extension, probabilistic safety analysis (PSA) methods were utilized. The results of these analyses show no significant increase in the core damage frequency. As a result, there would be no significant increase in the consequences of an accident previously evaluated. These analyses are detailed in CE NPSD-994, "Combustion Engineering Owners Group Joint Applications Report for Safety Injection Tank AOT/STI Extension."

The AOT extension based upon boron concentration outside the prescribed limits