## March 12, 2004

Mr. R. T. Ridenoure
Division Manager - Nuclear Operations
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
Post Office Box 550
Fort Calhoun, NE 68023-0550

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 – REQUEST FOR ADDITIONAL

INFORMATION ON REQUEST FOR RELIEF RELATED TO REACTOR PRESSURE VESSEL NOZZLE INSPECTIONS (TAC NO. MC1115)

Dear Mr. Ridenoure:

By letter dated October 24, 2003, Omaha Public Power District (OPPD) submitted Request for Relief (RR) 9 for the third 10-year interval. The request proposed to use Code Case N-615, "Ultrasonic Examination as a Surface Examination Method for Category B-F and B-J Piping Welds." OPPD proposed to perform an alternative examination from the inside surface of the reactor pressure vessel nozzle-to-safe end weld.

The staff has completed its preliminary review of this submittal and has determined it needs additional information to complete the review. Our request for additional information is enclosed. This request was discussed with Richard Jaworski of your staff and it was agreed that a response would be provided within 30 days of receipt of this letter.

Sincerely,

#### /RA/

Alan B. Wang, Project Manager, Section 2 Project Directorate IV Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosure: Request for Additional Information

cc w/encl: See next page

Mr. R. T. Ridenoure
Division Manager - Nuclear Operations
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
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## Ft. Calhoun Station, Unit 1

#### CC:

Winston & Strawn ATTN: James R. Curtiss, Esq. 1400 L Street, N.W. Washington, DC 20005-3502

Chairman Washington County Board of Supervisors P.O. Box 466 Blair, NE 68008

Mr. John Kramer, Resident Inspector U.S. Nuclear Regulatory Commission P.O. Box 310 Fort Calhoun, NE 68023

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-4005

Ms. Sue Semerera, Section Administrator Nebraska Health and Human Services Systems Division of Public Health Assurance Consumer Services Section 301 Cententiall Mall, South P.O. Box 95007 Lincoln, NE 68509-5007

Mr. David J. Bannister, Manager Fort Calhoun Station Omaha Public Power District Fort Calhoun Station FC-1-1 Plant P.O. Box 550 Fort Calhoun, NE 68023-0550

Mr. John B. Herman Manager - Nuclear Licensing Omaha Public Power District Fort Calhoun Station FC-2-4 Adm. P.O. Box 550 Fort Calhoun, NE 68023-0550 Iowa Department of Public Health 401 SW 7<sup>th</sup> Street, Suite D Des Moines, IA 50309

Mr. Richard P. Clemens
Division Manager - Nuclear Assessments
Omaha Public Power District
Fort Calhoun Station
P.O. Box 550
Fort Calhoun, NE 68023-0550

Mr. Daniel K. McGhee Bureau of Radiological Health

#### REQUEST FOR ADDITIONAL INFORMATION

## REQUEST FOR RELIEF PERTAINING TO REACTOR VESSEL NOZZLE INSPECTIONS

# **OMAHA PUBLIC POWER DISTRICT**

## FORT CALHOUN STATION, UNIT NO. 1

### **DOCKET NO. 50-285**

By letter dated October 24, 2003, Omaha Public Power District (OPPD/the licensee) submitted Request for Relief (RR) 9 for the third 10-year interval. The request proposed to use the ASME Code Case N-615, "Ultrasonic Examination as a Surface Examination Method for Category B-F and B-J Piping Welds," (N-615). OPPD proposed to perform an alternative examination from the inside surface of the reactor pressure vessel nozzle-to-safe end weld. The staff has completed its preliminary review of this relief request and has determined that the following additional information is needed to complete the review.

1. Regulatory Guide 1.147, Revision 13, ""Inservice Inspection Code Case Acceptability—ASME Section XI, Division 1," disapproves the use of N-615 because it does not require a performance demonstration according to Appendix VIII. Therefore, N-615 is not applicable for use as an alternative to the Code unless accompanied with an Appendix VIII qualification.

The calibration block indicated that the subject welds are corrosion resistance cladded (CRC). The Code has recognized the difficulty in satisfying the performance demonstration criteria for CRC welds according to Appendix VIII. Therefore, in lieu of an Appendix VIII qualification, the Code imposed a Section V qualification and examination requirement. Because of the inability to reliably demonstrate through-wall examinations of CRC welds, this type of request for relief may be proposed as a hardship.

- 2. The submittal states that the relief is for six reactor pressure vessel nozzle-to-safe end dissimilar metal welds. Provide the unique identification for these welds.
- 3. On pages 3 and 4 of the submittal, the tables use the abbreviation "NDD". What is the definition of NDD?
- 4. The submittal describes the calibration block used for setting up equipment and demonstrating ultrasonic testing procedure. Provide a sketch of the site-specific welds in question showing the cladding (are both surfaces cladded on all six welds), weld/butter/base material (carbon steel, stainless steel, Inconel) restrictions (if any), inside surface irregularities, nominal wall thickness, and surface inspection volume.