UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 21, 2014

LICENSEE: Omaha Public Power District

FACILITY: Fort Calhoun Station, Unit 1

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE ON AUGUST 15, 2014, TO GRANT VERBAL RELIEF FOR RR-14 (TAC NO. MF4643)

This memorandum summarizes the telephone discussion on August 15, 2014, between the U.S. Nuclear Regulatory Commission (NRC) staff and Omaha Public Power District (OPPD, the licensee) staff regarding the licensee's request for relief RR-14 for Fort Calhoun Station, Unit 1 (FCS). Participants in the discussion included T. Simpkin, W. Hansher, M. Edwards, et al. (OPPD), and E. Oesterle, D. Alley, J. Tsao, M. Hay, and F. Lyon (NRC).

By letter dated August 15, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14230A157), OPPD requested relief from the requirements of the American Society of Mechanical Engineers *Boiler and Pressure Vessel Code* (ASME Code), Section XI, IWD-3120(b), at FCS.

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3)(ii), the licensee submitted Relief Request RR-14, which proposed to use an alternative methodology to ASME Code Case N-513-3 to disposition a pin hole leak in lieu of performing a repair on the leaking elbow of the raw water system piping immediately.

The licensee stated that it will perform a daily walk down and measurement of the leakage to confirm that the analysis supported by the ultrasonic testing remains valid. The licensee calculated an allowable axial through-wall flaw size of 4 inches and allowable circumferential through-wall flaw size of 10 inches. The leaking flaw is of pin hole size. There is a substantial margin between the pin hole flaw size and the allowable flaw size. The NRC staff concludes that the probability of pipe failure would be unlikely; therefore, the staff concludes that the licensee has provided an adequate justification that Relief Request RR-14 will provide a reasonable assurance of the structural integrity of the subject raw water piping.

The NRC staff concludes that the proposed alternative provides a reasonable assurance of structural integrity of the subject raw water piping. The NRC staff finds that complying with IWD-3120(b) of the ASME Code, Section XI, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(a)(3)(ii). Therefore, on August 15, 2014, Eric Oesterle, Acting Chief, NRR/DORL/LPL4-1, and David Alley, Chief, NRR/DE/EPNB, verbally authorized the use of Relief Request RR-14 at FCS until September 5, 2014, or when the leakage flaw size exceeds the allowable flaw size discussed above, whichever occurs first.

All other requirements in ASME Code, Section XI, for which relief was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector. The verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding the Relief Request while preparing the subsequent written safety evaluation.

If you have any questions, please contact me at (301) 415-2296 or by e-mail at fred.lyon@nrc.gov.

CFLyon

Carl F. Lyon, Project Manager
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Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-285

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All other requirements in ASME Code, Section XI, for which relief was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector. The verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding the Relief Request while preparing the subsequent written safety evaluation.

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/RA/

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