

March 20, 1991
LIC-91-082R

Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. NRC Generic Letter 89-13 "Service Water System Problems Affecting Safety-Related Equipment" dated July 18, 1989
 3. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated January 26, 1990 (LIC-90-0050)
 4. Letter from NRC (S. J. Collins) to OPPD (W. G. Gates) dated February 4, 1991, Inspection Report 91-02

Gentlemen:

SUBJECT: Implementation of Performance Testing for Component Cooling Water (CCW) Heat Exchangers (Hx)

The NRC conducted an inspection from January 7, to January 11, 1991, of activities Omaha Public Power District (OPPD) had taken regarding Generic Letter (GL) 89-13. As summarized in Reference 4, the NRC noted that "it was found that certain of your activities appeared to deviate from commitments made to the NRC...provide us your views on this matter within 30 days of the date of this letter." This statement was made specifically concerning the CCW Hx performance testing program as outlined in OPPD's response to GL 89-13 (Reference 3).

This letter is OPPD's response to the NRC's request of Reference 4. During a telephone call on March 6, 1991, the submittal date for this letter was extended to March 20, 1991, by Mr. L. Gilbert of NRC Region IV.

The inspection report (Reference 4) noted that the deviation from a commitment appeared to be a result of poor commitment tracking. An investigation determined that there was a breakdown in communication both in generation of the response to the Generic Letter, and in the tracking and closure of the associated commitments.

Following OPPD's response (Reference 3) to GL 89-13, enhancements were made to the procedures responsible for generation of responses to the NRC (NOD-QP-9), and tracking of the commitments (NOD-QP-23) made in these responses. These enhancements allow for clearer identification of commitments contained within responses, technical coordination of responses and stringent review/approval of the procedures that control responses. These enhancements should prevent the recurrence of an issue similar to that noted in Inspection Report 91-02.

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The inspection report additionally noted that "the root cause appeared to be inadequate engineering in the preparation of the test procedure...". OPPD believes that considerable thought was put into the development of these test procedures. The purpose of the initial performance of the test procedure for the Raw Water (RW)/CCW Hx's was to determine if the parameters could be accurately measured with the existing system instrumentation. Since the Hx's cannot be tested at design basis accident temperatures and flows, data must be collected at significantly lower values and extrapolated to verify the system's design. Therefore, it is critical to obtain accurate measurements. System Engineering had anticipated that modifications might be required following initial performance of the procedure and based on the results of initial testing, modification MR-FC-90-034 was initiated to ensure CCW Hx performance reliability."

Completion of this modification will allow the measurement and recording of actual shell and tube side pressure losses due to flow through the heat exchanger. The scope of modification MR-FC-90-034 was incorporated into modification MR-FC-90-026, which is to be installed by the end of the next refueling outage (scheduled to begin in January 1992).

Personnel involved with the CCW Hx testing program believed the intent of GL 89-13 was met as a result of initial CCW Hx testing conducted during the 1990 refueling outage and the development of plans to complete testing of the remaining heat exchangers. As noted to the inspectors during inspection 91-02, several interim actions were taken starting after the 1990 Refueling Outage, to ensure CCW Hx performance. These interim actions, along with the existing requirements for recording CCW and RW system operating parameters every two hours, provide a means of monitoring and trending heat exchanger performance, until the modification discussed above, and subsequent performance testing, can be completed.

OPPD will complete formal implementation of the safety-related heat exchanger test program as discussed in the response (Reference 3) to () 13 six months after the end of the next refueling outage.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

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c: LeBoeuf, Lamb, Leiby & MacRae
R. D. Martin, NRC Regional Administrator, Region IV
W. C. Walker, NRC Project Manager
R. P. Mullikin, NRC Senior Resident Inspector