

Omaha Public Power District

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November 19, 1982 LIC-82-368

Mr. W. C. Seidle, Chief Reactor Project Branch 2 U. S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Seidle:

Completion Schedule for the Fort Calhoun Station Drawing Update Effort

Omaha Public Power District responded to IE Inspection Report 81-15 by letter dated August 27, 1981. Specifically, the District's response to Unresolved Item 8115-04 provided our plan for eliminating the Fort Calhoun Station drawing updating backlog by December 31, 1983. The purpose of this letter is to provide the Commission with a status of the work completed to date and to update the expected completion schedule.

Since August, 1981, the District has made significant progress toward meeting the goal of updating all Fort Calhoun Station drawings to an "as-built" condition. A Document Update Team (DUT), consisting of six personnel experienced in nuclear power generation, has been formed to provide a dedicated, systematic approach for completing this task. To date, the DUT has expended several thousands of hours in reviewing modification documentation, investigating and field verifying modification packages, and marking applicable drawings to reflect the present plant condition. These marked-up drawings are then sent to an engineering drafting group, which has significantly increased staffing for this effort, for final updating. Utilizing this approach has proven to be very effective, but the total time required to complete a modification package has proven to be greater than anticipated. Upon realizing this trend, the District decided to revise our drawing updating approach and implement the following actions:

- (1) The DUT staffing will be increased by adding three more fulltime designers/engineers and one part-time engineer.
- (2) The DUT will review as many of the remaining modification packages as possible between now and the 1983 refueling outage to identify those modifications that require field verifications in areas that are normally inaccessible during

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power operation. Scheduling and completion of these field checks can then be completed during the upcoming 1983 refueling outage. Inaccessible modifications that require further verification or are not field checked during the 1983 outage will be verified during the 1984 refueling outage.

(3) During the review of the modification packages detailed above, the District will also identify those modifications that impact overall plant safety (e.g., fire protection and safety-related system modifications). The verification and inclusion of these modifications in the Fort Calhoun Station drawings will then be given the highest priority, since these changes have the most significance.

The District will continue to allocate the necessary resources for completing this drawing effort in a timely manner. Progress has been achieved in this large task, but the District estimates two refueling outages will be required to ensure all inaccessible modifications are field checked and walked down as necessary. Based on a schedule that necessitates two refueling outages for completion, the District now expects to complete the drawing update effort two months after completion of the 1984 refueling outage, which is tentatively scheduled during the spring of 1984.

Until all Fort Calhoun Station drawings are completely updated in 1984, Standing Order G-47, "Control Room Drawings", provides an interim measure to ensure control room P&ID's and electro-mechanical drawings utilized by plant operators are maintained current and identify all design changes to systems and equipment resulting from plant modifications. Additionally, the revised program approach detailed above will ensure the most important drawing revisions are completed first.

Sincerely,

W. C. Jones Division Manager

Production Operations

WCJ/TLP:jmm

cc: LeBoeuf, Lamb, Leiby & MacRae 1333 New Hampshire Avenue, N.W. Washington, D.C. 20036

> Mr. L. A. Yandell, NRC Senior Resident Inspector