



Omaha Public Power District

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December 1, 1982
LIC-82-358

Mr. Robert A. Clark, Chief
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Operating Reactors Branch No. 3
Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Clark:

Fort Calhoun Station Inservice
Inspection (ISI) Program Plan for
the 1980-1983 Period

Omaha Public Power District's letter dated September 28, 1978 transmitted the District's last revision to the ISI Program Plan and was applicable for the years 1976-1980. The District has now revised the ISI Program Plan to incorporate pertinent changes and additions since the last revision. Note that where required these changes have been previously approved by the Commission. Accordingly, for your information please find attached the report entitled "Omaha Public Power District Fort Calhoun Station Unit No. 1 Inservice Inspection Program Plan for the 1980-1983 Period". Attachment 1 identifies by plan page number the changes made to the plan since the September, 1978 revision and includes justification for these changes. Attachment 2 contains the subject report.

Sincerely,

W. C. Jones
Division Manager
Production Operations

WCJ/TLP:jmm

Attachments

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

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Attachment 1

The changes and additions to the ISI Program Plan implemented by the August, 1982 revision are detailed below. The changes/additions are identified by their page number location in the plan included as Attachment 2.

1) Page 1, Introduction

This change revises the time period for which this ISI Program Plan is applicable.

2) Page 1, Part 1.2.1

This addition incorporates the statement that the plan covers part of the first ten year ISI Program interval for the Fort Calhoun Station, which covers the period September 26, 1973 to September 26, 1983.

3) Page 7, Appendix 1B, Item No. B 1.4

The September, 1978 revision indicated that equipment was being developed to provide for 100% examination of the reactor vessel (RV) nozzle-to-vessel welds. Combustion Engineering has determined that these welds can be fully inspected from inside the nozzle utilizing a special RV examination device. The wording in the ISI Plan has been changed to reflect this inspection, which will be completed during the 1983 refueling outage.

4) Page 14, Exceptions

Changes the sentence, "Two men are required in the pump rooms at all times during the test." to "Two men are required in the pump rooms for 12 hours during the test."

This change provides the basis for the 240 mRem exposure cited in this paragraph.

5) Page 25

Valves LCV-218-3, HCV-240, and PCV-210 have been deleted from the ISI testing program because they are not safety-related. These valves were not addressed in the Commission's SER dated July 2, 1979 for the ISI Program at the Fort Calhoun Station because the Commission agreed during two telephone conversations on March 19 and March 23, 1979, between B. Hickle of the District and A. Wang of the Commission, to eliminate these valves from the ISI testing requirements.

6) Pages 26 and 27

During an engineering evaluation, the District determined that the maximum permissible opening time for the normally closed LPSI and HPSI loop valves is 12 seconds to ensure adequate SI flow reaches

the reactor when needed. This evaluation conclusion has been incorporated into Section 6.2.3.6 of the Updated Safety Analysis Report. Accordingly, the maximum permissible stroke times for LPSI valves HCV-327, 329, 331, and 333 and HPSI valves HCV-311, 312, 314, 315, 317, 318, 320, and 321 have been revised from 9.9 seconds to 12 seconds.

Additionally, the test schedules for valves HCV-347 and 348 have been revised from a cold shutdown (CS) to a refueling outage (RO) frequency. This change facilitates the testing of these valves while the reactor vessel cavity is flooded and, thus, shutdown cooling system operation can be temporarily terminated. Testing in the CS condition requires an alternate primary system heat removal path by means of steam generator blowdown, which provides marginal heat removal capability for this purpose. Therefore, a RO frequency is justified and will ensure functional testing is conducted at a frequency sufficient to identify valve operability problems.

7) Page 28

The stroke time for raw water valves HCV-2880B, 2881B, 2882B, and 2883B have been revised to 45 seconds to reflect the installation of new valves during the 1982 refueling outage.

8) Page 29

The auxiliary feedwater system cross-tie valve to the main feedwater system (HCV-1384) has become a critical valve in the District's justification for ensuring feedwater can be supplied to the steam generators in certain accident scenarios. Accordingly, HCV-1384 has been added to the ISI Program.

9) Pages 31 and 34

The following relief valves have been deleted from the ISI Program because the District has reviewed the valve's function and determined that it is not required to achieve a safe shutdown of the reactor or mitigate the consequences of an analyzed accident.

CH-208: Reactor Coolant Pump Controlled Bleedoff Heater Relief Valve
CH-223: Intermediate Pressure Letdown Relief Valve
CH-224: Low Pressure Letdown Relief Valve
CH-336: Heat Traced Piping Relief Valve
AC-341: Component Cooling Water Surge Tank Vent Header Relief Valve
AC-4A-HX: Shutdown Cooling Heat Exchanger No. 4A Relief Valve
AC-4B-HX: Shutdown Cooling Heat Exchanger No. 4B Relief Valve
AC-8-HX: Storage Pool Heat Exchanger Relief Valve

10) Page 42

The Commission's letter dated June 29, 1981 granted relief from the ISI testing (i.e., exercising) of check valves SI-159 and 160 through September 26, 1983. The ISI Program has been revised accordingly.

Attachment 2