

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 5, 1995

Mr. Terry L. Patterson
Division Manager - Nuclear Operations
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
Post Office Box 399
Hwy. 75 - North of Fort Calhoun
Fort Calhoun, Nebraska 68023-0399

SUBJECT: SAFETY EVALUATION OF RELIEF REQUESTS AND ANOMALY RESPONSES FOR THE

THIRD INTERVAL PUMP AND VALVE INSERVICE TESTING PROGRAM - FORT

CALHOUN STATION, UNIT 1 (TAC NO. M84963)

Dear Mr. Patterson:

By letter dated June 21, 1995, Omaha Public Power District submitted Revision 2 to Fort Calhoun Station's third 10-year interval program for inservice testing of pumps and valves. This revision includes responses to eleven anomalies identified in the NRC safety evaluation (SE) dated June 21, 1994. Also included for NRC review were an unrevised valve relief request (E6) and four revised valve relief requests (G1, E1, E2, and E3). Relief requests E3 for pumps and E5 for valves were deleted.

The enclosed SE provides the results of the NRC's review of the responses to the anomalies and the relief requests. The SE indicates the following:

- (1) For valve relief requests El, E2, and E3, as addressed in Anomaly 3, the licensee should perform an investigation of non-intrusive testing and expand the bases to show extreme hardship, as required by Generic Letter (GL) 89-04 if the disassembly interval is extended from one valve every refueling outage to one valve every other refueling outage. For Anomaly 4 concerning valve relief request E2, the licensee should specifically address the GL 89-04 requirement regarding partial-stroke exercising following disassembly and inspection. If this exercising is impractical, the licensee should propose an alternative that offers a reasonable assurance of the valve's operational readiness following reassembly.
- (2) Deferred testing justification J7 states that the check valves in question will be full-stroke exercised only in the open direction. The licensee has adequately responded to the NRC's comment regarding J7 in our June 21, 1994, SE. However, the NRC is currently reexamining the adequacy of Position 1 of GL-89-04, which states that "a check valve's full-stroke to the open position may be verified by passing the maximum required accident condition flow through the valve," since merely passing design basis flow does not ensure obturator movement or indicate

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a missing, misaligned, or stuck-open obturator. Any change in Position 1 will be addressed in future generic correspondence. Therefore, for those cases where only design basis flow is used to verify full-stroke of check valves, the licensee may wish to consider including other positive means to verify full obturator movement.

No relief request is required for valve relief request E6, which meets (3) the ASME Section XI requirements, and for generic valve relief request G1, which is outside the scope of the IST program.

The NRC's evaluation of your responses to the anomalies identified in the SE dated June 21, 1994, for Fort Calhoun Stations third 10-year interval IST program shows that with the exception of Anomalies 3, 4, and 10, the responses are acceptable.

Sincerely.

Original signed by:

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Steven Bloom, Project Manager Project Directorate IV-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

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Docket No. 50-285

Enclosure: Safety Evaluation

cc w/encl: See next page

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Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

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cc w/encl: Winston & Strawn ATTN: Perry D. Robinson, Esq. 1400 L Street, N.W. Washington, DC 20005-3502

Mr. Jack Jensen, Chairman Washington County Board of Supervisors Blair, Nebraska 68008

Mr. Wayne Walker, Resident Inspector U.S. Nuclear Regulatory Commission Post Office Box 309 Fort Calhoun, Nebraska 68023

Mr. Charles B. Brinkman, Manager Washington Nuclear Operations Combustion Engineering, Inc. 12300 Twinbrook Parkway, Suite 330 Rockville, Maryland 20852

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Ms. Cheryl Rodgers, LLRW Program Manager Environmental Protection Section Nebraska Department of Health 301 Centennial Mall, South P.O. Box 95007 Lincoln, Nebraska 68509-5007

Mr. James W. Chase, Manager Fort Calhoun Station Post Office Box 399 Fort Calhoun, Nebraska 68023