

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102
402/536-4000

July 27, 1984
LIC-84-237

Mr. James R. Miller, 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

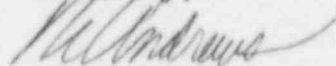
Dear Mr. Miller:

NUREG-0737 Technical Specifications
(Generic Letter 83-37)

NUREG-0737, "Clarification of TMI Action Plan Requirements," identified those items for which Technical Specifications would be required. Generic Letter 83-37, dated November 1, 1983, provided guidance concerning the scope of Technical Specifications the staff would find acceptable, and also provided samples in Standard Technical Specification format. Accordingly, the Omaha Public Power District, in a letter dated March 27, 1984, provided discussion concerning these recommended specifications for Fort Calhoun Station's auxiliary feedwater system. Subsequently, the District received your letter dated June 15, 1984, which provided the Safety Evaluation Report (SER) for this issue. That SER found, in part, that the District's quarterly surveillance testing requirements for the Auxiliary Feedwater Pumps was in disagreement with the Generic Letter's monthly specifications. The SER stated that the District's current program was acceptable pending a change from a quarterly to a monthly test frequency.

The Omaha Public Power District has reviewed the SER and believes the quarterly test frequency provides adequate assurance that the auxiliary feedwater system will function as required for design base accidents. Discussions concerning the SER have been held with members of your staff and are documented in the attachment to this letter. In accordance with this, the District believes the quarterly test frequency is sufficient and requests that the SER be revised accordingly.

Sincerely,



R. L. Andrews
Division Manager
Nuclear Production

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Attachment

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

Mr. E. G. Tourigny, NRC Project Manager

Mr. L. A. Yandell, Senior Resident Inspector

Employment with Equal Opportunity
Male/Female

A046
1/1

Attachment

Auxiliary Feedwater System Technical Specification Changes (NUREG-0737, Item II.E.1.1)

Sections 4.7.1.2.a.1 and 4.7.1.2.a.2 of Generic Letter 83-37 require licensees to perform monthly surveillance testing of the auxiliary feedwater system. Fort Calhoun Station Unit No. 1 Technical Specifications require quarterly surveillance testing. The Commission's SER dated June 15, 1984, stated that "Quarterly testing is not acceptable."

The Omaha Public Power District believes that quarterly testing is acceptable. This belief is based upon the following discussion. The testing of the auxiliary feedwater pump falls under the District's Inservice Inspection Program as submitted to the Commission. Specifically, Part 2: Class 1, Class 2 and Class 3 Pump and Valve Tests, Section 2.2.1 states "The inservice test frequency for Class 1, Class 2 and Class 3 pumps are in accordance with Article IWP-3000 of Section XI."

Appendix 2A of the ISI Program Plan goes on to define the pumps requiring inservice testing. Among these are the Auxiliary Feedwater Pumps FW-6 and FW-10.

The District's Inservice Inspection Program is conducted in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. The acceptability of utilizing the Code is based upon Commission approval of the ASME Code as provided in 10 CFR 50.55(a). The ASME Section XI code is based on sound engineering principles and has been accepted by the NRC. The Omaha Public Power District either complies fully with 10 CFR 50.55(a) or has submitted requests for relief from the requirements of the Code. Therefore, we believe that deviation from the Code requirements is unnecessary as our quarterly test frequency provides full compliance with the regulation.

Additionally, this testing frequency is consistent with that currently incorporated into the Fort Calhoun Station Technical Specifications for pumps utilized in similar safety functions such as the safety injection pumps (See Technical Specification 3.6(3)(a)). The basis for this specification states, in part:

"the active components (pumps & valves) are to be tested every three months to check the operation of the starting circuits and to verify that the pumps are in satisfactory running order. The test interval of three months is based on the judgement that more frequent testing would not significantly increase the reliability (i.e., the probability that the component would operate when required), yet more frequent tests would result in increased wear over a long period of time."

The quarterly testing has remained an acceptable Technical Specification and an acceptable portion of the ISI Program, both approved by the Commission. Plant personnel monitor the results of the Fort Calhoun Surveillance Testing Program and their reviews have not indicated the need to increase the testing frequency. The District believes that the current Technical Specification for quarterly testing of the auxiliary feedwater pumps is acceptable and no viable safety concern exists which would mandate changing to a monthly surveillance schedule.