

Omaha Public Power District  
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402/636-2000

May 12, 1995  
LIC-95-0111

Mr. L. J. Callan  
Regional Administrator  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

References: 1. Docket No. 50-285  
2. Letter from NRC (T. P. Gwynn) to OPPD (T. L. Patterson) dated April 14, 1995 (NRC Inspection Report 50-285/95-05)

SUBJECT: Inservice Inspection Plan

The Reference 2 Inspection Report summarized an inspection of the ASME code-related inservice inspection processes and program for Fort Calhoun Station (FCS). That report stated, "...the apparent difficulties that the licensee was experiencing in obtaining plan approval was indicative of a lack of strong management oversight of the program." Omaha Public Power District (OPPD) considers this to be an inaccurate characterization which should be appropriately rectified.

The FCS Third Ten Year Inservice Inspection Interval started on September 26, 1993. The ISI Program Plan for FCS includes both the Inservice Test (IST) Program and Inservice Inspection NDE (Nondestructive Examination) Program. The two programs were reviewed separately by NRC/NRR. The Inservice Testing Program was approved on June 21, 1994. Negotiations between OPPD and NRC/NRR over the specific content of the ISI Plan Inspection Schedule have delayed approval of the ISI program, as detailed below.

In order to minimize radiation dose associated with ISI inspections and respond cost-effectively to changes in FCS Maintenance schedule, OPPD has maintained that some flexibility in the ISI Inspection Schedule is required. The acceptability of such flexibility can be inferred from the 1989 Edition of the ASME Boiler and Pressure Vessel Code, Section XI, which states that successive exams are to be in the same sequence as previous intervals "to the extent practical." NRC/NRR has requested a detailed schedule for the ISI Plan. OPPD has not previously provided a detailed ISI Inspection Schedule as requested because of the inflexibility implicit in such a schedule.

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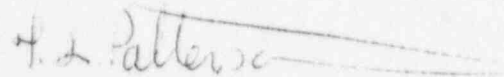
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Discussions between NRC/NRR and OPPD on the plan schedule have centered around the appropriate level of detail in the plan schedule and the methodology used to prepare the schedule. These issues were satisfactorily resolved in a meeting between OPPD and NRC/NRR on May 10, 1995. This will enable OPPD to submit a plan schedule acceptable to NRC/NRR.

OPPD emphasizes that there has been significant management oversight of the ISI Program. The attachment is a historical summary of OPPD/NRR communications on the Third Interval ISI Program. OPPD management up to the Department Manager level was involved in all of the listed activities, with all submittals approved through the Division Manager level. When the January 31, 1995 RAI was received indicating NRR dissatisfaction with the level of detail in the plan schedule, OPPD staff members expeditiously arranged a telephone conference with NRR and briefed their Division Managers.

In summary, OPPD has exerted significant management oversight of the FCS ISI Program, and plans to continue this practice. OPPD requests that NRC documentation associated with the referenced inspection report accurately reflect this fact. If you have any questions, please call me.

Sincerely,



T. L. Patterson  
Division Manager  
Nuclear Operations

TLP/tcm

Attachment

c: Winston & Strawn  
T. P. Gwynn, NRC Region IV  
W. C. Walker, NRC Senior Resident Inspector  
T. Y. Liu, NRC Acting Project Manager  
Document Control Desk

HISTORY OF COMMUNICATIONS WITH NRC/NRR  
ON THE FORT CALHOUN STATION THIRD INTERVAL ISI PROGRAM

November 13, 1992	Initial submittal of the Third Ten Year Interval ISI Program Plan.
July 12, 1993	NRR Request for Additional Information (RAI).
August 24, 1993	OPPD/NRR conference call to discuss OPPD's response to the RAI. NRR accepted proposed OPPD responses.
September 9, 1993	OPPD's formal response to the RAI was submitted, with an agreement to supply in September 1994 some additional information that was not easily obtainable.
March 15, 1994	OPPD/NRR conference call to discuss the ISI program and OPPD's formal RAI response. NRR specifically stated that the proposed detail for the ISI Program Plan was acceptable. Additional detail on FCS's 100% Reactor Vessel exam was also requested.
March 23, 1994	OPPD submitted additional detail on FCS's RPV exam as requested in the March 15 call.
September 30, 1994	OPPD submitted the remaining information requested in the July 1993 RAI.
January 31, 1995	NRR provided an additional RAI which reversed their previous position on the level of detail required in the ISI Program Plan Inspection Schedule.
March 9, 1995	OPPD responded to the January 31 RAI, but deferred resolution of the inspection schedule issue until after the 1995 Refueling Outage.
May 10, 1995	OPPD/NRR meeting to discuss and resolve the inspection schedule issue.