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

February 1, 1985 LIC-85-028

Mr. Darrell G. Eisenhut, Director Office of Nuclear Reactor Regulation Division of Licensing U. S. Nuclear Regulatory Commission Washington, DC 20555

Reference: Docket No. 50-285

Dear Mr. Eisenhut:

Certification of Compliance to 10 CFR 50.49, Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants (Generic Letter 84-24)

On January 11, 1985, the Omaha Public Power District received by telecopy from our NRC Project Manager, Mr. E. G. Tourigny, your Generic Letter 84-24 dated December 27, 1984. This letter requests, pursuant to 10 CFR 50.54(f), specific information regarding the environmental qualification of safety-related electrical equipment at the Fort Calhoun Station. In the attachment to this letter, please find, under oath or affirmation, the requested information.

Sincerely, a andrews

R. L. Andrews Division Manager Nuclear Production

RLA/DJM/dao

Attachment

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

> Mr. E. G. Tourigny, NRC Project Manager Mr. L. A. Yandell, NRC Senior Resident Inspector

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of

Omaha Public Power District (Fort Calhoun Station, Unit No. 1) Docket No. 50-285

AFFIDAVIT

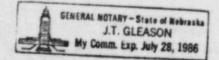
R. L. Andrews, being duly sworn, hereby deposes and says that he is Division Manager - Nuclear Production of the Omaha Public Power District; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to Generic Letter 84-24 dated February 1, 1985; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

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R. L. Andrews Division Manager Nuclear Production

STATE OF NEBRASKA)) ss COUNTY OF DOUGLAS)

Subscribed and sworn to before me, a Notary Public in and for the State of Nebraska on this l_{5T} day of February, 1985.



ATTACHMENT

Certification of Compliance with 10 CFR 50.49 As Requested by Generic Letter 84-24

NRC Request (a)

"Each licensee ... is requested to submit ... a certification that: (a) the utility has in place and is implementing an Environmental Qualification (EQ) Program that will satisfy the requirements of 10 CFR Section 50.49 within the currently approved schedule for the plant without further extension ..."

District Response (a)

The District certifies that it has implemented an Equipment Qualification Program which meets the requirements of 10 CFR 50.49. The methodology, program, and Regulatory Guide 1.97 schedule (10 CFR 50.49(b)(3)) are outlined in the District's letter of May 31, 1984, LIC-84-121 as amended by LIC-84-370, dated November 16, 1984, and by LIC-85-009 dated January 10, 1985. Elements of the program essential to ensuring qualification were implemented prior to the Fort Calhoun Station 10 CFR 50.49 deadline of the second refueling outage after March 31, 1982. It snould be noted that within the currently approved schedule, one item of equipment (electrical penetration subassemblies) is not fully qualified in accordance with 50.49. A request for extension and a justification for continued operation (JCO) has been submitted for this item as noted in (b) below. At this time the District does not believe any other extensions are required.

NRC Request (b)

"Each licensee ... is required to submit ... a certification that: ... (b) the plant has at least one path to safe shutdown using fully qualified equipment, or has submitted a justification for continued safe operation (JCO) pending full qualification of any equipment not fully qualified ..."

District Response (b)

The District certifies that safe shutdown can be achieved. At least one path to safe shutdown exists using fully qualified equipment with the exception of the electrical penetrations. A justification for continued operation (JCO) and request for extension was provided in a letter dated July 3, 1984. Based on staff review and discussion concerning this extension request, the District is preparing a revised JCO. The revised JCO will reflect these discussions and is expected to be submitted by February 15, 1985.

NRC Request (c)

"Each licensee ... is required to submit ... a certification that: ... (c) all other equipment within the scope of 50.49 is either fully qualified or a JCO has been submitted pending full qualification."

District Response (c)

The District certifies that electrical equipment within the scope of 10 CFR 50.49 is qualified with the exception of the electrical penetrations as discussed above in (b).

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NRC Request (d)

The certifications requested in (a), (b) and (c) above should specifically address all IE Bulletins and Information Notices that identify EQ problems, to the extent that such bulletins and notices are relevant to the licensee's facility. The following Bulletins and Information Notices are considered applicable to these certifications: IE Bulletin 82-04, IE Information Notices 82-11, 82-52, 83-45, 83-72, 84-23, 84-44, 84-47, 84-57, 84-68, and 84-78.

District Response (d)

The District has procedures in place which require the review of Information Notices and Bulletins for applicability to the Fort Calhoun Station. Upon completion of the required reviews, the District determines what necessary actions are to be taken. The above referenced Bulletins and Notices have been or are being reviewed according to the established procedures.

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