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OCT 25 1984

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Docket No. 50-285

Mr. R. L. Andrews, Division Manager  
 Nuclear Production  
 Omaha Public Power District  
 1623 Harney Street  
 Omaha, Nebraska 68102

Dear Mr. Andrews:

This letter is in response to your two letters dated July 27, 1984 regarding your auxiliary feedwater (AFW) system technical specifications. Letter number LIC-84-239 provided clarification as to the actual testing of the AFW system. Letter number LIC-84-237 discussed your current practice of quarterly testing the AFW system. Your letters were in response to our safety evaluation on this subject which was sent to you on June 15, 1984.

The submittal numbered 239 provides clarification as to the actual testing of the AFW system with respect to the Technical Specifications identified in our Generic Letter No. 83-37, II.E.1.1 dated November 1, 1983, specifically Section 4.7.1.2.a.5. That section requires a dedicated individual to be in communication with the control room and to be stationed near any local manually realigned valves when only one auxiliary feedwater train is available. You stated that only part of the AFW testing requires realignment of valves such that the AFW train being tested would be unavailable. For this portion of the test, the individual preventing the AFW train from being available to perform its function is the operator at the AFW panel in the control room. Since all operations needed to realign the AFW train under test can be performed by the operator from the control room, we maintain our previous conclusion that Section 4.7.1.2.a.5 is not ~~applies~~ applicable for Fort Calhoun. *← applicable*

Submittal number 237 discusses your current practice of quarterly AFW testing as compared to the staff's requirement for monthly AFW testing. An assessment was made of all operating reactors' AFW systems and referenced in NUREG-0737. The details of the assessment for Combustion Engineering designed operating plants were reported in NUREG-0635. This assessment was based on a 30 day testing frequency. This testing frequency, which is part of the standard Technical Specifications, has resulted in timely identification of potential problems. Thus to permit using quarterly testing would be contrary to our experience at other facilities and would invalidate the Fort Calhoun assessment. Therefore we maintain our position, as stated in our June 15, 1984 letter, that you must provide monthly testing of the AFW system as required in NUREG-0737 and documents referenced therein.

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Mr. R. L. Andrews

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As a result of your letters and our letters on this subject, it appears we are at an impasse at resolving this final issue. The issue is basically the testing frequency of the AFW system. Your staff believes that quarterly testing is appropriate; the NRC staff believes that monthly testing is appropriate. I propose that we conduct an appeals meeting in Bethesda, Maryland within thirty days after your receipt of this letter and resolve this final issue.

If you have any questions relating to this letter, please contact your NRC project manager.

Sincerely,

Original signed by:

James R. Miller, Chief  
Operating Reactors Branch #3  
Division of Licensing

cc: See next page

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L.S. RUBENSTEIN

\* See Previous Concurrence

Mr. R. L. Andrews

- 2 -

*conduct on appeals meeting*

As a result of your letters and our letters on this subject, it appears we are at an impasse at resolving this final issue. The issue is basically the testing frequency of the AFW system. Your staff believes that quarterly testing is appropriate; the NRC staff believes that monthly testing is appropriate. I propose that we meet in Bethesda, Maryland within thirty days after your receipt of this letter and resolve this final issue.

If you have any questions relating to this letter, please contact your NRC project manager.

Sincerely,

James R. Miller, Chief  
Operating Reactors Branch #3  
Division of Licensing

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Omaha Public Power District

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