

Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/655-2000

October 1992
LIC-123

U. S. Nuclear Regulatory Commission
Att: Document Control Desk
Mail Station: 1-137
Washington, DC 20555

- REFERENCES: 1. Docket No. 50-285
2. Letter from OPPD (W. Gates) to NRC (Document Control Desk) dated July 30, 1991 (91-177R)
3. Letter from NRC (S. Bloom) to OPPD (W. Gates) dated August 24, 1992

Gentlemen:

SUBJECT: Corrective Actions for Post Accident Sampling System Dissolved Gas Analysis

Omaha Public Power District (OPPD) requested in Reference 2 that a commitment to use the Post Accident Sampling System (PASS) automated dissolved gas analysis sequence for reactor coolant (RC) be deleted and credit instead be taken for grab samples and subsequent off-site analysis. Reference 2 was initiated to resolve a longstanding problem with the reliable operation of this PASS function. Troubleshooting and corrective actions through July 1991 were not successful in correcting the automated dissolved gas analysis problems.

In Reference 3, the NRC denied the OPPD request submitted by Reference 2. The NRC also requested that OPPD provide details of the actions and schedule for resolving problems with the dissolved gas equipment in the PASS. Following is OPPD's response to this request.

With the assistance of the original PASS designer, OPPD has determined that the existing PASS equipment should be usable with certain changes. OPPD has subsequently implemented a course of actions as noted below to resolve the aforementioned problems. Upon completion of these actions, OPPD is reasonably certain that the PASS dissolved gas analysis sequence for RC will reliably meet or exceed applicable requirements consistent with the original design intent.

The original PASS designer has evaluated the dissolved gas equations and the programmable controller sequencing, and has recommended changes. An independent evaluation of the dissolved gas equations has confirmed the equation results. Pertinent valves were hydrostatically tested to verify their impermeability. The actual volumes have been verified for the three flasks used by the PASS to measure liquids and gases.

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Actions not yet complete include performing additional measurements after system modification to add drain taps and determine which piping is not drained between the sequencer cycles. The programmable controller sequencer logic may be changed to incorporate pre-cooling of the RC sample. When the above tasks are completed, validation testing of the system will be performed to verify that the PASS dissolved gas equipment is operable and that the calculated results meet the Reg. Guide 1.97 accuracy requirements. PASS operating instructions and related chemistry procedures will then be revised.

OPPD plans completion of the system modification, sequencer changes, validation testing, analysis, and inputs to related documents by February 19, 1993. Document revision approval is scheduled by April 2, 1993. Completion of related personnel training is scheduled by May 14, 1993. OPPD will notify the NRC of any changes to this schedule.

If you should have any questions, please contact me.

Sincerely,



W. G. Gates
Division Manager
Nuclear Operations

WGG/tcm

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Project Manager