

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

June 24, 1985
LIC-85-254

Mr. Edward J. Butcher, Acting Chief
Operating Reactors Branch #3
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

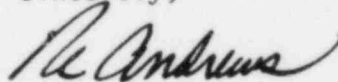
References: (1) Docket No. 50-285
(2) Letter OPPD (W. C. Jones) to NRC (J. R. Miller)
dated November 4, 1983 (LIC-83-267)
(3) Letter NRC (J. R. Miller) to OPPD (R. L. Andrews)
dated March 25, 1985

Dear Mr. Butcher:

Generic Letter 83-28 - Request for
Additional Information Following Preliminary
Staff Review of Licensee Responses

The Omaha Public Power District received Reference (3) which requested additional information regarding our Reference (2) submittal. Accordingly, please find attached the requested additional information regarding Item 4.5.3 of Generic Letter 83-28.

Sincerely,



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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ATTACHMENT

NRC Request

Item 4.5.3-Incomplete

Licensee's response shall present additional information supporting their belief in the adequacy of their on-line testing intervals that addresses the five considerations mentioned in this generic letter item.

Generic Letter 83-28 Item 4.5.3

"Existing intervals for on-line functional testing required by Technical Specifications shall be reviewed to determine that the intervals are consistent with achieving high reactor trip system availability when accounting for considerations such as:

1. uncertainties in component failure rates
2. uncertainties in common mode failure rates
3. reduced redundancy during testing
4. operator errors during testing
5. component "wear-out" caused by the testing

Licensees currently not performing periodic on-line testing shall determine appropriate test intervals as described above. Changes to existing required intervals for on-line testing as well as the intervals to be determined by the licensees currently not performing on-line testing shall be justified by information on the sensitivity of the reactor trip system availability to parameters such as the test intervals, component failure rates and common mode failure rates."

District Response from Reference (2)

The Omaha Public Power District believes the existing intervals for on-line functional testing of the reactor protective system are appropriate. During ten years of experience using existing test procedures, one instance of trip has occurred. This occurrence was during testing in which the reactor was tripped due to faulty test switches. These switches were replaced.

The plant has had ten (10) years of reliable operation. This experience coupled with the existing maintenance and surveillance programs provide a high level of assurance for the Fort Calhoun Station reactor protective system.

District's Response to Request for Additional Information

The District participated in the Combustion Engineering Owners Group Task on Reactor Protection System Test Interval Evaluation. The five considerations provided in Generic Letter 83-28 were addressed as part of this work. Results for the District's Fort Calhoun Station demonstrate that the District's current intervals are adequate and conservative.

