Omaha Public Power District

1623 Harney Omaha, Nebraska 68102-2247 402/536-4000

> January 20, 1986 LIC-86-003

Mr. H. R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washingotn, DC 20555

Reference:

1. Docket No. 50-285

Letter OPPD (Andrews) to NRC (Butcher) dated
 June 17, 1985 (LIC-85-217)

3. Letter OPPD (Andrews) to NRC (Butcher) dated October 15, 1985 (LIC-85-438)

Dear Mr. Denton:

Plant Specific Approval to Use Code Case N-408, Alternative Rules for Examination of Class 2 Piping, Section XI Division 1

The Omaha Public Power District, in References 2 and 3, requested exemption from ISI testing of certain inaccessible sections of containment recirculation piping buried in concrete. The request for exemption was necessary because the NRC had not yet accepted Code Case N-408 which clearly addresses the problem. Regulatory Guide 1.147, Revision 4, dated September, 1985, documents NRC approval of Code Case N-408. Attachment A, Technical Report in Support of Plant Specific Approval to Use Code Case N-408, provides OPPD's analysis and justification to use the Code Case. Therefore, OPPD requests that plant specific approval to use Code Case N-408 at Fort Calhoun Station be granted by the Commission, pursuant to Paragraph 50.55a(a)(3) of 10 CFR Part 50, and that the exemptions requested by References 2 and 3 be withdrawn.

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Sincerely,

R. L. Andrews Division Manager Nuclear Production

RLA/HMT/me

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

E. G. Tourigny, NRC Project Manager

P. H. Harrell, NRC Senior Resident Inspector Employment with Equal Opportunity
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