In Reply Refer To: Docket: 50-285/88-25

Omaha Public Power District

ATTN: Kenneth J. Morris, Division Manager

Nuclear Operations

1623 Harney Street Omaha, Nebraska 68102

Gentlemen:

Thank you for your letter of August 25, 1988, in response to our questions raised during NRC Inspection Report No. 50-285/88-25. We have reviewed your letter and find it responsive to the concerns raised in our inspection.

Original Stemed By
L. J. Callin

L. J. Callan, Director Division of Reactor Projects

cc: Fort Calhoun Station ATTN: W. G. Gates, Manager P.O. Box 399 Fort Calhoun, Nebraska 68023

Harry H. Voigt, Esq. LeBoeuf, Lamb, Leiby & MacRae 1333 New Hampshire Avenue, NW Washington, D. C. 20036

Nebraska Radiation Control Program Director

bcc to DMB (IEO1)
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\*RIV:RI \*C:MQPS WMcNeill/cig IBarnes / /88 / /88 \*D:DRS JLMilhoan / /88 D: DRP of LJCallan

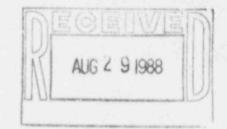
\*Previously concurred

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## Omaha Public Power District

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

August 25, 1988 LIC-88-736



U. S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Station P1-137 Washington, DC 20555

References:

1. Docket No. 50-285

2. Letter from OPPD (R. L. Andrews) - NRC (R. D. Martin) dated

December 23, 1987 (LIC-87-691)

Gentlemen:

SUBJECT:

Update to Response to Notice of Violation concerning Safety System Outage Modification Inspection (SSOMI)

Please find attached an update to Reference 2. This update is being submitted as a result of questions raised during Inspection 50-285/88-25. The original response to violation H.3 indicated that the dye penetrant test procedure and the inspection report form have been revised. At the time of Reference 2, the form was part of the procedure and the acceptable temperature range was included in the procedure. The form was changed to require that the actual surface temperature of the parts being tested be documented. The response has been clarified and is attached. The change is denoted by a vertical line in

If you have any questions, please contact us.

Sincerely,

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the right hand margin.

for K. J. Morris Division Manager Nuclear Operations

KJM/me

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae

R. D. Martin, NRC Regional Administrator

P. D. Milano, NRC Project Manager

P. H. Harrell, NRC Senior Resident Inspector

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H.3 Dye penetrant inspections for MR 85-062 (replacement of CCW flow element) were found to have been accomplished and accepted at surface temperatures below the minimum allowed by procedures. The inspections were redone and two of four welds examined were found to be unacceptable because of linear indications. (IR 50-285/85-29, D2.6-1)

OPPD admits that the original dye penetrant (PT) examination of the welds associated with the replacement of FE-498 was performed at a pipe temperature below the minimum allowed in the procedure.

This violation occurred because the inspection report form in use at the time did not specify temperature limits or recording of the actual temperature and the inspector involved did not realize that the piping was below the minimum allowable temperature.

The PT procedure specifies a minimum temperature of the parts being examined of 60°F. The actual temperature of the CCW supply header at the time the initial PT was performed between 47° to 51°F.

Despite the fact that the procedure is usable at temperatures below the specified minimum, the welds in question were retested. Two of the four welds had rejectable linear indications. Before the welds were reexamined, OPPD's QC inspector informed the NRC inspector that reexamination of the welds would probably result in discontinuities. The discontinuities were predicted on the basis that corrosion had formed on the weld material during the  $1\frac{1}{2}$  months which had elapsed since the welds were made. Experience has shown that cleaning would not be effective in removing the corrosion. Minor dressing of the welds with a file was sufficient to clean the welds so that reexamination was acceptable. The two welds were again re-examined and this time, exhibited no rejectable indications.

The PT procedure has been revised to require recording of the actual surface temperature of the parts being tested on the Liquid Penetrant Inspection Report Form (FC-182).

Based on the corrective actions taken, OPPD is presently in full compliance.