

**Omaha Public Power District**  
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October 6, 1988  
LIC-88-868

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

- References:
1. Docket No. 50-285
  2. Generic Letter 87-02 "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, USI A-46"
  3. Letter from NRC (L. C. Shao) to SQUG (N. P. Smith) dated July 29, 1988
  4. Letter from SQUG (N. P. Smith) to NRC (L. C. Shao) dated August 19, 1988

Gentlemen:

SUBJECT: Response to Generic SER on SQUG Resolution of  
Unresolved Safety Issue A-46

The NRC Staff has recently issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the Seismic Qualification Utility Group (SQUG) (Reference 3). In addition to the issuance of the SER, the NRC requested that SQUG member utilities provide within 60 days, a schedule for implementing the GIP. This letter responds to the NRC request for the Omaha Public Power District (OPPD) plant-specific seismic verification plans for Fort Calhoun, consistent with the requirements of Generic Letter 87-02.

As members of SQUG and the Electric Power Research Institute (EPRI), OPPD has supported the many efforts on which the GIP is based. The SER endorses the methodology and criteria embodied in the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG and its contractors is underway to resolve the identified open issues and comments. A schedule for the resolution of these items was presented at the August 10-11, 1988 meeting between SQUG and the NRC staff. This schedule projects completion of Revision 2 in the Spring of 1989, contingent upon SQUG and NRC agreement on the resolution of the various open issues. Revision 2 is scheduled to contain the information needed to implement the USI A-46 generic letter at SQUG member plants. The final NRC SER Supplement on Revision 2 is anticipated by mid-1989.

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OPPD's plans for implementation of the GIP at Fort Calhoun Station are necessarily preliminary given the current schedule for completion of Revision 2 and the NRC's SER Supplement on that revision. However, it is our current plan to resolve USI A-46 for Fort Calhoun by implementation of the generic criteria and methodology included in Revision 0, as clarified by the SQUG responses contained in Reference 4. OPPD plans to perform the seismic verification plant walkdown required by the conclusion of the first refueling outage after receipt of the final SER Supplement and resolution of all open issues. This assumes no major changes in the workscope currently envisioned, as described in Revision 0 including the criteria to be added in Revision 1 for cable raceways, tanks, heat exchangers, and relays. If the final NRC SER Supplement with no open items is issued by the second quarter of 1989, then the plant walkdown at Fort Calhoun is expected to be completed by the middle of 1990. Identification of safe shutdown equipment, gathering of necessary plant-specific data and training of our walkdown team members will be initiated prior to the 1990 outage.

OPPD's current implementation plan and schedule, as described above, are based on the "SQUG Commitments" identified in each section of the GIP. In addition, implementation and schedule commitment is contingent upon our current understanding of the GIP. If the scope of the final revision of the GIP or the cost and effort required to implement it at our plant changes significantly from the current scope and cost estimates, we will reevaluate our commitments. In view of the uncertainties in the requirements and schedule for resolution of these related issues, it may be necessary to revise the implementation schedule for USI A-46 at Fort Calhoun to integrate these potential future requirements into a single, cost-effective program. This possibility has been the subject of on-going discussions between SQUG and your staff, and further discussions are planned. You will be advised in writing of any changes in these implementation plans and schedules.

If you have any questions concerning this matter, please contact us.

Sincerely,

  
K. J. Morris  
Division Manager  
Nuclear Operations

KJM/mc

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