



Fort Calhoun Station
P.O. Box 550, Highway 75
Fort Calhoun, NE 68023-0550

March 15, 2006
LIC-06-0026

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555

- References:
1. Docket No. 50-285
 2. Letter from OPPD (R. T. Ridenoure) to NRC (Document Control Desk) dated October 28 2005, Relief Request for Use of "Radiography Using Phosphor Imaging Plate" (LIC-05-0122)
 3. Letter from NRC (A. B. Wang) to OPPD (R.T. Ridenoure) dated February 9, 2006, "Request for Additional Information Related Relief Request for Use of "Radiography Using Phosphor Imaging Plate" (TAC No. MC8843), (NRC-06-0015)
 4. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) date February 16, 2006, Response to Request for Additional Information for Fort Calhoun Station Unit No. 1 Relief Request for Use of "Radiography Using Phosphor Imaging Plate" (TAC No. MC8843) (LIC-06-0017)

SUBJECT: Clarification of Response to Request for Additional Information for Fort Calhoun Station Unit No. 1 Relief Request for Use of "Radiography Using Phosphor Imaging Plate" (TAC No. MC8843)

In support of the Omaha Public Power District's (OPPD) Relief Request for Use of Radiography Using Phosphor Imaging Plate, Reference 2, we recently submitted our response, Reference 4, to the NRC's Request for Additional Information, Reference 3. The purpose of this letter is to document clarifications provided by OPPD in Reference 4 as discussed during a telephone conference on March 9, 2006. These clarifications are provided in the Attachment to this letter.

No commitments to the NRC are made in this letter.

If you require additional information, please contact Thomas C. Matthews at (402) 533-6938.

Sincerely,

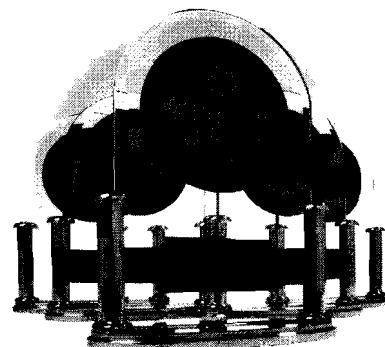
S.K. Gambhir

Division Manager - Nuclear Projects

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SKG/rlj

Attachment: OPPD Clarifications of the Response to Request for Additional Information for Fort Calhoun Station Unit No. 1 Relief Request for Use of "Radiography Using Phosphor Imaging Plate"

cc: Director of Consumer Health Services, Department of Regulation and Licensure, Nebraska
Health and Human Services, State of Nebraska

**OPPD Clarifications of the Response to Request for Additional Information for
Fort Calhoun Station Unit No. 1 Relief Request for Use of “Radiography Using
Phosphor Imaging Plate”**

Clarifications are being provided to OPPD’s response to questions 2 & 3 of Reference 4 as follows:

Clarification A:

Refer to Attachment of Reference 4, page 2, OPPD Response to Question 2, second paragraph of section 1.

The text to be clarified:

“OPPD is requesting permission to use the requirements of MAVIII as the radiographic examination technique. In the case of the 1992 Edition, MAVIII will be implemented except where the requirements governing the use of IQIs of the 1992 Edition conflict with the requirements of MAVIII. In that case, the requirements of the 1992 Edition will govern.”

Clarification:

OPPD has determined that the IQI requirements of the 92 Edition of ASME as required by NB5111 are more conservative than the requirements of MAVIII. Therefore, the use of the 1992 Edition will also meet the requirements of MAVIII. For a given material thickness, the IQI listed in Table NB 5111-1 require at least the same designated IQI and in many cases a smaller (thinner) IQI than MAVIII. This makes the designation of the IQI (NB 5111) equivalent to or more conservative than MAVIII.

This is also true of UW-51. In all cases when comparing IQIs on a material thickness basis the IQIs listed in UW-51 are equivalent to or more conservative than MAVIII.

Therefore OPPD will follow the requirements of the 1992 Edition and UW-51 for IQI selection.

Clarification B:

Refer to Attachment of Reference 4, page 3, OPPD Response to Question 2, the third sentence of the section 3.

The text to be clarified:

“Additional training in the use of phosphors image plate technology and the interpretation of the associate radiographic image will be provided to inspectors. These requirements will be part of the procedure governing the qualification and certification of nondestructive examination inspectors.”

Clarification:

The word “inspectors” in both cases of this sentence should be replaced by the word “examiners” to clarify that these are the individuals performing the inspection. The word “Inspector” refers to the ANI Inspector and is not the intended recipient of the training.

Clarification C:

Refer to Attachment of Reference 4, page 3, OPPD Response to Question 3, paragraph 1.

The text to be clarified:

- 1) “The use of DR with Phosphor Imaging Plates for code acceptance of welds was successfully performed at Arkansas Nuclear One - Unit 1 during their 2005/06 Steam Generator Replacement Outage.”

Clarification:

Digital RT was successful at Arkansas Nuclear One – Unit 1 in examinations which were modeled using mockups prior to performing the examinations. FCS will use mock-ups for the planned scope of the examinations.