

Omaha Public Power District
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402/636-2000

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April 15, 1991
LIC-91-0063

Secretary
U. S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, DC 20555

References: 1. Docket No. 50-285
2. Codes and Standards for Nuclear Power Plants 56 Fed. Reg.
3796 (January 31, 1991) Comments on Proposed Rule

Gentlemen:

SUBJECT: Comment on Proposed Amendment to 10 CFR 50.55a

These comments are submitted by Omaha Public Power District (OPPD) in response to the proposed rule of the U.S. Nuclear Regulatory Commission incorporating the 1986 Addenda, 1987 Addenda, 1988 Addenda and the 1989 Editions of ASME Boiler and Pressure Vessel Code, Section III, Division 1 and Section XI, Division 1, by reference into 10 CFR Part 50.55a (55 Fed. Reg. 52330 - December 27, 1990).

Regarding the proposed amendment concerning Containment Isolation Valves (CIV), OPPD has the following comments:

- Omaha Public Power District opposes the proposed amendment to modify the provisions of OM Part 10 to eliminate the exemption of Containment Isolation Valves not providing a reactor coolant system pressure isolation function from mandatory leak rate analysis and corrective action if the valve, or combination of valves, fail to meet the leak rate acceptance criteria. OPPD's position is based on the concern that the amendment would require and result in unneeded shutdowns or outage extensions when the 0.6 overall containment leak rate acceptance criteria is not in jeopardy.

Regarding the increased scope of reactor pressure vessel ISI from 100% of one circumferential and one longitudinal shell weld to 100% of the length of all reactor pressure vessel shell welds, OPPD has the following comment:

- OPPD is opposed to the proposed amendment. The basis for selection of welds for examination under the ISI Program is statistical in nature. The statistical nature of examination selection is based on the assumption that components (e.g. welds) that are carefully controlled during manufacture will behave

similarly under similar operating conditions. Therefore, a 100% examination sample is not felt to be necessary to detect component degradation. The proposed amendment appears to be contrary to this philosophy and the cost of the additional examinations and extended outages is not felt to be justified by a commensurate improvement in confidence in RPV integrity.

Regarding the proposed expedited examination requirement for the ISI of 100% of the length of all reactor pressure vessel shell welds, OPPD has the following comment:

- OPPD is opposed to the proposed amendment. Since Fort Calhoun Station (FCS) is planning their RPV examination during the Winter 1992 Refueling Outage, and since FCS is in the 3rd period of our Second Ten Year inspection interval, the proposed expedited schedule would require OPPD to either react rapidly to expand the scheduled RPV examination scope to 100% in less than one year, or face the potential requirement of removing the core support barrel again during the 1st period of the 3rd ten year interval (prior to 1996). Thus, the proposed expedited schedule that is intended to prevent certain plants from going 20 years before performing a 100% examination of their RPV shell welds could require FCS to perform two RPV examinations in less than five years. While expansion of a presently scheduled examination from 22% to 100% of the shell welds would cost a substantial amount of money and increase the 1992 outage by an estimated 3.5 days, performing an additional examination during the 1993, 1995 or 1996 outages is expected to cost over ten times as much and require a 17 day outage extension. OPPD feels that neither of these costs justify the benefit to be gained by expediting the 100% RPV shell weld examination.

Should you have any questions regarding OPPD's comments, please contact Mr. Chuck Bloyd directly at (402) 533-6921.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/pjc

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