**Omaha Public Power District**
1623 Harney Omaha, Nebraska 68102
402/536-4000

September 26, 1983
LIC-83-242

Mr. James R. Miller, Chief
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Operating Reactors Branch No. 3
Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Miller:

Fort Calhoun Station In-Service Inspection (ISI)
Program Plan For The 1982-83 Period.

The ending date for Fort Calhoun Station's (FCS) first 120 month ISI Program Plan is September 26, 1983. This plan was last revised in August, 1982, for the inspection period from 1980 to 1983. In order to reflect significant changes in testing, and to summarize all the exceptions to the 1974 ASME code which now have been taken (including those taken during the 1983 ten year reactor vessel examination), the updated ISI Program Plan published in August, 1982, has again been brought up to date. Attachment 1 identifies all changes made to the plan since the August, 1982, edition. These changes are listed by page number, with an explanation for each change. Attachment 2 is the final version of the 1973-1983 In-Service Inspection Program Plan for the Fort Calhoun Station.

Sincerely,

W. C. Jones
Division Manager
Production Operations

WCJ/JCB/nh

Attachments

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Mr. E. G. Tourigny, Project Manager
Mr. L. A. Yandell, Senior Resident
Inspector

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Attachment 1

CHANGES MADE SINCE THE AUGUST, 1982 EDITION
OF THE FORT CALHOUN STATION ISI PROGRAM PLAN

Pages 5 & 6: Addition of the "Exemption on Safety Injection and Containment Spray Discharge Piping With Respect to Hydro Test Pressures". As explained in the "Basis for Exception", analysis and consultation with the pump manufacturer indicated that subjecting the suction side of these pumps to the discharge hydro pressure would damage the pumps. The later editions of the code have recognized this unfortunate oversight in the early additions and have made the distinction on hydro-test boundaries more specific, so this is no longer a problem under the later codes. Despite this correct change to the later codes and the technically correct nature of this action, to be within the "letter of the law" under the 1974 code, we would either have to actually test the pumps to full discharge pressure or we must specifically have an exemption from testing, and that is why this exemption has been added.

Page 8: Exceptions to IWB-2600, Items B1.2 and B1.6. As a result of the 1983 reactor vessel examination performed by the Southwest Research Institute, limitations to the areas of Class 1 components specified for examination under the code were identified. Specifically, it was found that certain of the head welds (Item B1.2) and parts of the nozzle to safe end welds (Item B1.6) could not be accessed for examination. The reasons for the limitations and alternate methods of verification are listed in the plan.

Page 9: Removal of the Exception to Item B4.5 of Table IWB-2600 of the 1974 Code. This exception has been removed because the technical limitations on ultrasonic examination of certrifugally cast stainless steel pipe and welds in such pipe have been overcome.

Page 27: Deletion of TCV-211-1 and 2. These valves were deleted per plant request and Technical Services' concurrence that they are not safety related. (It should be noted that under the 1980 code all PCV, LCV, and TCV valves may be removed from testing, if they do not receive an accident signal. This change, reflecting the fact that continuous correct operation of a system pressure, level, or temperature is considered sufficient, is evidence of valve operability.)

Page 44: Removal of the Exception for HCV-746A. This valve is no longer tested in a direction opposite that of actual flow, so no exception is now needed.