

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

March 19, 1984
LIC-84-052

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:

Inservice Inspection and Testing Program
Relief From ASME Boiler and Pressure
Vessel Code, Section XI

The Omaha Public Power District, on September 26, 1983, submitted the 1983-1993 Inservice Inspection (ISI) Program Plan to the Commission. Included in the plan was a list of all known exemptions required from the Section XI Code. Attached to this letter are copies of replacement pages 1, 7, 8, 23, 29, and 50 of that submittal. The reasons and justification for changes and new exemptions are as follows:

- (1) Page 1: The statements, "Class 3 portions of the Waste Disposal System have been optionally classified as Class 3 in accordance with Subarticle IWA-1300, Paragraph (g.) of the Section XI Code. Examination in accordance with the rules of Article IWD will not be performed on the Class 3 portion of the Waste Disposal System.", have been added. This option is provided for in the Winter, 1980 Addenda of the Section XI Code.
- (2) Page 7: Item B1.40 has been revised to allow for partial examination of the closure head-to-flange weld. Location of the seismic skirt attachment lugs and the skirt itself is responsible for the limitations in access to the weld. The current statement in the plan incorrectly implies complete inaccessibility.
- (3) Page 8: Item B12.10 has been revised. The District's position has been revised such that unless a reasonable and accurate method is found to perform volumetric examinations of the reactor coolant pump casing welds, a surface examination of the outside surface of the welds on one pump shall be performed before the end of the 1983-1993 inspection interval.

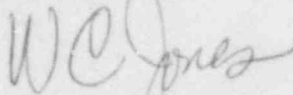
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- (4) Page 23: Subarticle exceptions to inlet pressure measurement and differential pressure measurement have been added. Inlet pressure cannot be directly measured due to system design. Therefore, direct differential pressure measurement is also not possible.
- (5) Page 29: Per changes on page 50, test frequency for HCV-240 and HCV-249 has been changed from quarterly to refueling outage. Page 29 provides the basis for this change. Cycling these valves during operation would cause excess pressurizer spray, resulting in a reactivity excursion.
- (6) Page 50: Same as above for page 29.

It is requested that the Commission replace the current version of these pages with the attached pages and consider these changes as part of the evaluation of the District's exemption requests for the 1983-1993 interval.

Sincerely,



W. C. Jones
Division Manager
Production Operations

WCJ/DJM:jmm

Attachments

cc: LeBoeuf, Lamb, Leiby & MacRae
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