

**OPPD**

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

March 12, 1985  
LIC-85-055

Mr. James R. Miller, Chief  
Office of Nuclear Reactor Regulation  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

- References: (1) Docket No. 50-285  
(2) Letter OPPD (W. C. Jones) to NRC (J. R. Miller) dated July 7, 1983 (LIC-83-161)  
(3) Letter OPPD (W. C. Jones) to NRC (J. R. Miller) dated September 26, 1983 (LIC-83-226)  
(4) Letter OPPD (W. C. Jones) to NRC (J. R. Miller) dated March 19, 1984 (LIC-84-052)  
(5) Letter NRC (J. R. Miller) to OPPD (W. C. Jones) dated April 6, 1984

Dear Mr. Miller:

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

In Reference (2), the Omaha Public Power District sent a preliminary list of exemption requests to the NRC with regard to the Class 1, 2 and 3 weld examinations required to be performed at the Fort Calhoun Station to satisfy the ASME Section XI requirements. References (3) and (4) amended and finalized these exemption requests.

In References (2), (3), and (4) the relief request to Item B3.10 of Table IWB-2500-1 of Section XI has remained the same, viz.:

B 3.10      The nozzle-to-vessel welds cannot be 100% volumetrically examined since the nozzle supports present an interference to currently available equipment. The nozzle-to-vessel welds will be examined during the reactor vessel examination. This examination will be from the inside.

In the NRC "Staff Evaluation" (from Reference (5)) of this exemption request, the following statement was made:

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PDR ADOCK 05000285  
Q PDR

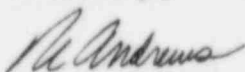
The NRC staff has determined that the volume accessible for examination from the nozzle-to-vessel external surface in addition to the volume examined from the nozzle-to-vessel internal surface will cover a sufficient amount of the volume required to be examined to provide a high degree of assurance that inservice flaws either do not exist, or will be detected in the vessel-to-nozzle weld and base metal.

Please note the words "in addition to" in the above evaluation. During the District's 1983 refueling outage, an examination of the nozzle-to-vessel welds was performed from the inner diameter of the nozzle just as stated in our exemption request. Our ISI vendor, in their final report, indicated no difficulty in achieving 100% weld volume coverage from the inner diameter. The District wishes to clarify that using the standard 0°, 45°, 60°, and 70° ultrasonic scans from the inner diameter, 100% of the code-required weld volume can be scanned.

Therefore, if the examination is deferred to the end of the 10-year interval, 100% of the code-required weld volume can be examined. Unlike the Code followed for the first ten-year interval, the 1980 edition of the Code allows deferral of the examination until the end of the interval. Further, the 1980 edition of the Code allows for either internal or external examination. Thus, the District does not believe an outer diameter examination, as prescribed in Reference 5 is required, and, based upon the 1980 edition of the Code, an exemption is no longer required either.

We respectfully request that this matter be clarified when you issue the final SER for the remaining ASME Boiler and Pressure Vessel Code exemption requests for the interval 1983-1993.

Sincerely,



R. L. Andrews  
Division Manager  
Nuclear Production

RLA/DJM/rh-M

cc: LeBoeuf, Lamb, Leiby and MacRae  
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Mr. E. G. Tourigny, NRC Project Manager  
Mr. L. A. Yandell, NRC Resident Inspector