

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

February 28, 1985
LIC-85-016

Mr. James R. Miller, Chief
Office of Nuclear Reactor Regulation
Division of Licensing
Operating Reactors Branch #3
U. S. Nuclear Regulatory Commission
Washington, DC 20555

References: (1) Docket No. 50-285
(2) Letter from NRC (J. R. Miller) to OPPD (R. L. Andrews)
dated October 25, 1984

Dear Mr. Miller:

Auxiliary Feedwater System Technical Specifications
Auxiliary Feedwater Pump Testing Frequency

The Omaha Public Power District received Reference (2) concerning the surveillance test frequency of the Auxiliary Feedwater (AFW) Pumps at the Fort Calhoun Station. Since the receipt of Reference (2) the District has had several discussions with you and members of your staff concerning this issue.

During these discussions the District stated that the past operating, maintenance and testing history of the Fort Calhoun AFW pumps does not indicate the need to increase the testing frequency from quarterly to monthly. The AFW pump surveillance testing is conducted in accordance with 10 CFR 50.55a and Section XI of the ASME Boiler and Pressure Vessel Code. The District also stated that the quarterly test frequency is consistent with the test frequency for pumps utilized for similar functions at Fort Calhoun Station (e.g., containment spray and safety injection pumps.)

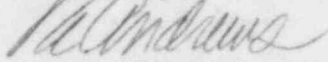
To date, the District has not received a technical basis that would justify monthly rather than quarterly testing. Should a technical basis exist, the District would review that basis and determine if changes are appropriate. We believe that the technical basis for this backfit requirement should demonstrate that the benefits of increased testing are commensurate with the associated costs. Further, we believe the justification for this backfit should demonstrate that the increased testing will, in fact, enhance reliability without causing unnecessary and untimely degradation due to wear.

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The District is anxious to resolve this issue. We are willing to provide additional information concerning the operating history, if necessary. If it is your belief that an appeals meeting as described in Reference 2 is necessary, it will be arranged through our Project Manager.

Sincerely,



R. L. Andrews
Division Manager
Nuclear Production

RLA/JJF/dao

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

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