

Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

September 21, 1992
LIC-92-301R

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P-137
Washington, DC 20555

- References:
1. Docket No. 50-235
 2. NRC Generic Letter 87-02, dated February 19, 1987
 3. Letter from OPPD (K. J. Morris) to NRC (Document Control Desk) dated December 2, 1988 (LIC-88-506)
 4. NRC Generic Letter 87-02, Supplement 1, Dated May 22, 1992
 5. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated July 31, 1992 (LIC-92-016R)
 6. Letter from Seismic Qualification Utility Group (N. P. Smith) to NRC (J. G. Partlow) dated August 21, 1992

Gentlemen:

SUBJECT: Response to Generic Letter (GL) 87-02, Supplement 1, Seismic Qualification Utility Group (SQUG) Resolution of Unresolved Safety Issue (USI) A-46, for Fort Calhoun Station Unit No. 1

Attached is the Omaha Public Power District response to GL 87-02, Supplement 1. This response is being submitted under oath as required.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/grc

Attachment

- c:
- LeBoeuf, Lamb, Leiby & MacRae
 - J. L. Milhoan, NRC Regional Administrator, Region IV
 - R. P. Mullikin, NRC Senior Resident Inspector
 - S. D. Bloom, NRC Project Manager

9209290108 920921
PDR ADDCK 05000285
P PDR

A02511

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

Omaha Public Power District
(Fort Calhoun Station
Unit No. 1)

Docket No. 50-285

AFFIDAVIT

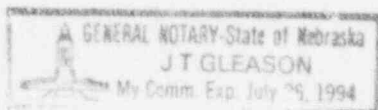
W. G. Gates, being duly sworn, hereby deposes and says that he is the Division Manager - Nuclear Operations of the Omaha Public Power District; that as such he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached information concerning the response to Generic Letter 87-02, Supplement 1, dated May 22, 1992; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information, and belief.

W. G. Gates
W. G. Gates
Division Manager
Nuclear Operations

STATE OF NEBRASKA)
COUNTY OF DOUGLAS) ss

Subscribed and sworn to before me, a Notary Public in and for the State of Nebraska on this 2/ST day of September, 1992.

J. T. Gleason
Notary Public



Omaha Public Power District Response to Generic Letter (GL) 87-02, Supplement 1,
Seismic Qualification Utility Group (SQUG) Resolution of
Unresolved Safety Issue A-46, for Fort Calhoun Station

I. INTRODUCTION

On February 19, 1987, the NRC issued Generic Letter 87-02, Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46. This Generic Letter encouraged utilities to participate in a generic program to resolve the seismic verification issues associated with USI A-46. As a result, the Seismic Qualification Utility Group (SQUG) developed the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment. On May 22, 1992, the NRC Staff issued Generic Letter 87-02 Supplement 1, which constituted the NRC's review of the GIP and which included Supplemental Safety Evaluation Report Number 2 (SSER-2) on the GIP, Revision 2, corrected on February 14, 1992. This requested that SQUG member utilities provide to the NRC, within 120 days, a schedule for implementing the GIP. By letter dated August 21, 1992, to James G. Partlow, NRR-NRC, SQUG clarified that the 120 days would expire on September 21, 1992.

II. COMMITMENT TO GIP

GIP Commitments

As a member of SQUG, Omaha Public Power District (OPPD) commits to use the SQUG methodology as documented in the GIP (where "GIP" refers to GIP Revision 2, corrected February 14, 1992) to resolve USI A-46 at Fort Calhoun Station (FCS). The GIP, as evaluated by the NRC Staff, permits licensees to deviate from the SQUG commitments embodied in the commitment sections, provided the NRC staff is notified of substantial deviations prior to implementation. OPPD recognizes that the NRC's position in SSER-2 "is that if licensees use other methods that deviate from the criteria and procedures as described in SQUG commitments and in the implementation guidance of the GIP, Revision 2, without prior NRC staff approval, the method may not be acceptable to the staff and, therefore, may result in a deviation from the provisions of" Generic Letter 87-02.

Specifically, OPPD hereby commits to the SQUG commitments set forth in the GIP in their entirety, including the clarifications, interpretations, and exceptions identified in SSER-2 as clarified by the August 21, 1992, SQUG letter responding to SSER-2.

GIP Guidance

Generally, OPPD will be guided by the remaining (non-commitment) sections of the GIP, i.e., GIP implementation guidance, which comprises suggested methods for implementing the applicable GIP commitments. OPPD will notify the NRC as soon as practicable, but no later than the final USI A-46 summary report, of significant or programmatic deviations from the guidance portions of the GIP, if any. Justifications for such deviations, as well as for other minor deviations, will be retained by OPPD for NRC review.

III. IN-STRUCTURE RESPONSE SPECTRA

For defining seismic demand, OPPD will use the options provided in the GIP for median-centered and conservative design in-structure response spectra, as appropriate, depending on the building, location of equipment in the building, and equipment characteristics.

For most equipment, OPPD intends to use the licensing-basis SSE ground or in-structure response spectra as described in the FCS Updated Safety Analysis Report (USAR) Appendix F, Section F.2.2.3, as one of the "conservative design" spectra options provided in the GIP for resolution of USI A-46. For outlier resolution and for some equipment (e.g., intake structure equipment for which no design basis in-structure spectra exist), OPPD intends to optionally use, after NRC approval, the Alternate Seismic Criteria and Methodologies (ASCM) as "median-centered" SSE spectra for Fort Calhoun Station, as submitted by References 3 and 5. Procedures and criteria specific to the ASCM are described in these submittals.

IV. SCHEDULE

Given the magnitude of the effort required to achieve resolution of USI A-46, final implementation must be carefully integrated with outage schedules and the seismic IPEEE response, the completion of which will be affected by the USI A-46 implementation start date. Considering the workload set forth by the criteria of the GIP, a Seismic Evaluation Report summarizing the results of the A-46 program at FCS will be submitted to the NRC by September 29, 1995. This date is consistent with the guidance in Section II.4.2 (Page 14) of SSER-2 for the GIP, and corresponds to 3 years plus 60 days from the date of the Reference 5 submittal, which substantially updated the ASCM. This schedule assumes acceptability of the ASCM.

V. PLANT SEISMIC LICENSING BASIS

OPPD may change, including adoption of the GIP, its licensing basis methodology for verifying the seismic adequacy of existing, new and replacement electrical and mechanical equipment. If this is necessary, a schedule will be provided prior to the receipt of a final plant-specific SER resolving USI A-46. This change will be conducted under 10 CFR 50.59 and will be consistent with the guidance in Section 2.3.3 or Part I of the GIP, Revision 2, and with the clarifications, interpretations, and exceptions identified in SSER-2 as clarified by the August 21, 1992, SOUG letter responding to SSER-2. Any necessary changes to the USAR will be provided in accordance with 10CFR50.71(e).