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

July 9, 1985
LIC-85-295

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Reference: Docket No. 50-285

Dear Mr. Thompson:

Implementation of Integrated Schedules
for Plant Modifications
Generic Letter 85-07

The Omaha Public Power District recently received the subject letter dated May 2, 1985. This letter requested views on the Integrated Living Schedule concept. Since that time, the District held an informal conversation with our Project Manager concerning the background information and philosophy of this topic.

Please find attached the survey information requested by the subject letter. It should also be noted that our desire to participate in this project is based upon our preliminary assessment of the Integrated Living Schedule concept and its potential advantages.

Sincerely,

R. L. Andrews
Division Manager
Nuclear Production

RLA/DJM/dao

Attachment

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

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

A001
1/1

ATTACHMENT

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: Fort Calhoun Station Unit No. 1

UTILITY: Omaha Public Power District

I. INTENTIONS

A. Intend to work with the staff to develop an ILS — Yes

B. Have reservations that must be resolved before developing ILS — ____

C. Do not presently intend to negotiate an ILS with the staff — ____

D. Plan to implement an informal ILS only — ____

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes (No)

If yes, select best description:

Engineering judgement ____
Analytic Hiearchy process ____
Risk based analysis ____
Cost-benefit analysis ____
Other (please describe) ____

If no, provide estimated date for selecting a methodology: ____ Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: estimated as June, 1986.

2. What is your estimated date for making a submittal to the NRC- ____

or

If not presently available, planned date for scheduling a submittal to the NRC: 4th quarter, 1986 - 1st quarter, 1987.

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s) N/A

or

Separate submittal scheduled for _____ (Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame_____

Phone Number_____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact_____

Time Frame_____

Phone Number_____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

In order for a Integrated Living schedule to be effective, a utility must develop and utilize a prioritization system which will ensure schedules to be determined for both NRC and utility projects. This prioritization system should ensure that the necessary factors are weighed and schedules are set realistically and fairly. In some cases, utility-sponsored projects would warrant a higher priority than an NRC project.

III. ADDITIONAL ITEMS Comments (Continued)

The following is an example to demonstrate the thought process we believe is beneficial in terms of developing a prioritization system. Consider two projects, one utility-sponsored, the second NRC-suggested. The NRC-sponsored project requires a major modification. This modification would provide an additional degree of redundancy to a particular system. This system performs no accident mitigation function, it is simply to be utilized in monitoring the consequences of particularly remote accident. Nonetheless, this modification does, under certain scenarios, provide an added degree of assurance that the accident events will be known. And for those scenarios, that information is valuable for understanding the accident. Its benefit to the health and safety of the public depends upon the failure of one system in combination with a particular accident, none of which the system can do anything about, nor which knowledge of will aid the safety of the public. The utility-sponsored project relates to a modification to increase the reliability of a particular component of the plant. The modification involves no safety considerations. The entire purpose of the modification is to make the system run a bit better, more efficiently. Yet by increasing efficiency, do you not increase safety in other ways? By ensuring that a relatively minor system operates better, you decrease the likelihood of smaller accidents from occurring.

To consider another case, the prioritization process and NRC acceptance thereof should allow for utility sponsored projects which do not result in the modification of any system. For example, additional training for operating personnel on the existing plant systems may be of far greater value than the installation of an additional modification to monitor the results of remote accident scenarios. There is not a finite measurement of what impact such training would have on safety enhancement, yet judgement must also be credited in the prioritization process.

To prioritize and schedule within the limits of financial and human resources for any given time frame, the most effective use of those resources should allow utility-NRC agreement that will recognize and allow for the timely implementation of those projects.