

444 South 16th Street Mall
Omaha NE 68102-2247

March 3, 2003
LIC-03-0019

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter from NRC (Samuel J. Collins) to OPPD (R. T. Ridenoure) dated February 11, 2003, Issuance of Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors (NRC-03-025)

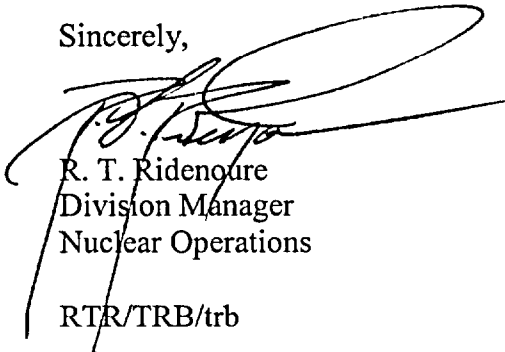
SUBJECT: Answer to Commission Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors

Pursuant to the requirements of 10 CFR 2.202(a)(2), Omaha Public Power District (OPPD) hereby submits its answer to the Order establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors (hereinafter "Order") issued by the United States Nuclear Regulatory Commission (NRC) on February 11, 2003.

I declare under penalty of perjury that the foregoing is true and correct and copies of the answer were sent to the addressee and listed individuals. (Executed on March 3, 2003).

No commitments are made to the NRC in this letter. If you have additional questions, or require further information, please contact Dr. R. L. Jaworski at (402) 533-6833.

Sincerely,



R. T. Ridenoure
Division Manager
Nuclear Operations

RTR/TRB/trb

Attachment

c: see attached Certificate of Service

A101

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Omaha Public Power District) Docket No. 50-285
Fort Calhoun Station Unit 1, DPR-40)
)

LICENSEE'S ANSWER TO FEBRUARY 11, 2003
COMMISSION ORDER ESTABLISHING INTERIM INSPECTION REQUIREMENTS FOR
REACTOR PRESSURE VESSEL HEADS AT PRESSURIZED WATER REACTORS

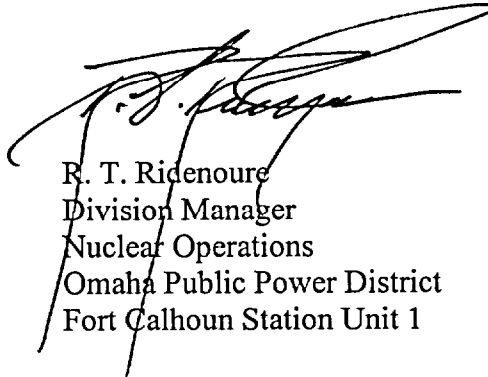
On February 11, 2003, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled Order Modifying Licenses (Effective Immediately) ("Order") to, *inter alia*, Omaha Public Power District (OPPD). The Order stated that the discovery of leaks and nozzle cracking at the Davis-Besse Nuclear Power Station and other pressurized water reactor (PWR) plants has made clear the need for more effective inspections of RPV heads and associated penetration nozzles. The current RPV head inspection requirements require visual examination of the insulated surface or surrounding area for signs of leakage. Based on recent experience, current inspection requirements in the ASME Code and related NRC regulations do not provide adequate assurance that reactor coolant pressure boundary integrity will be maintained for all combinations of construction materials, operating conditions, and operating histories at PWRs and are not sufficient to reliably detect circumferential cracking of RPV head nozzles and corrosion of the RPV head. Revising the ASME Code and subsequently the NRC regulations will take several years. Licensees actions to date in response to the NRC bulletins have provided reasonable assurance of adequate protection of public health and safety for near term operating cycles, but cannot be relied upon to do so for

the entire interim period until NRC regulations are revised. Circumferential cracking of RPV head nozzles and corrosion of the RPV head pose a safety concern because of the possibility of a nozzle ejection or loss-of-coolant accident if the conditions are not detected and repaired. Therefore, the NRC stated it was imposing requirements as set forth in the Order. The Order establishes interim requirements to ensure that licensees implement and maintain appropriate measures to inspect and, as necessary, repair RPV heads and associated penetration nozzles. OPPD has responded to the substantive requirements of the Order by letter LIC-03-0018 dated March 3, 2003 in accordance with the provisions of 10 C.F.R. § 50.4, as directed by the Order.

In accordance with Section IV of the Order and 10 CFR 2.202, OPPD hereby submits its answer to the Order. OPPD consents to the Order and specifically does not request a hearing.

I declare under penalty of perjury that the foregoing is true and correct. (Executed on March 3, 2003).

Respectfully submitted,



R. T. Ridenoure
Division Manager
Nuclear Operations
Omaha Public Power District
Fort Calhoun Station Unit 1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Omaha Public Power District)
Fort Calhoun Station Unit 1) Docket No. 50-285
DPR-40)
)

CERTIFICATE OF SERVICE

I hereby certify that copies of the ANSWER TO JANUARY 7, 2003, COMMISSION ORDER ESTABLISHING INTERIM INSPECTION REQUIREMENTS FOR REACTOR PRESSURE VESSEL HEADS AT PRESSURIZED WATER REACTORS in the captioned action have been served on the following by deposit in express mail service or fax, this 3rd day of March 2003. I declare under penalty of perjury that the foregoing is true and correct. (Executed on March 3, 2003).

Secretary
Office of the Secretary
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications
Staff
Washington, DC 20555-0001

Senior Resident Inspector – Fort Calhoun
Station Unit 1
U.S. Nuclear Regulatory Commission
Highway 75, 3 miles South of Blair,
Nebraska
Fort Calhoun, NE 68023

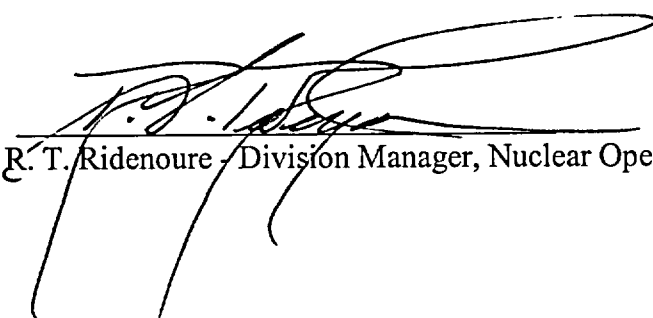
Director, Office of Nuclear Reactor
Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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(signed original and three copies)

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R. T. Ridenoure - Division Manager, Nuclear Operations