

April 12, 2000

Mr. S. K. Gambhir
Division Manager - Nuclear Operations
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
Post Office Box 399
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SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 - APPROVAL OF PROPOSED
REVISION TO OMAHA PUBLIC POWER DISTRICT'S FORT CALHOUN
STATION QUALITY ASSURANCE PROGRAM DESCRIPTION
(TAC NO. MA6563)

Dear Mr. Gambhir:

By letter dated September 16, 1999, Omaha Public Power District (OPPD) requested NRC approval of a proposed revision to the Fort Calhoun Station (FCS) Quality Assurance (QA) Program contained in Appendix A of the Updated Safety Analysis Report (USAR).

OPPD proposed to revise its commitments regarding the qualifications of personnel performing quality control inspections of activities affecting the fire protection program at the FCS. This request was submitted in accordance with the requirements of 10 CFR 50.54(a)(3) as reflecting changes that reduced commitments in the FCS QA Program description previously approved by the NRC.

The staff concludes that the reductions in commitments you identified continue to satisfy the requirements of Appendix B to 10 CFR Part 50 and are, therefore, acceptable. A copy of the related safety evaluation is enclosed.

Sincerely,

/RA/

L. Raynard Wharton, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
PROPOSED REVISIONS TO THE QUALITY ASSURANCE PROGRAM DESCRIPTION

OMAHA PUBLIC POWER DISTRICT
FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

1.0 INTRODUCTION

By letter dated September 16, 1999, Omaha Public Power District (OPPD) requested NRC approval of a proposed revision to the Fort Calhoun Station (FCS) Quality Assurance (QA) Program contained in Appendix A of the Updated Safety Analysis Report (USAR).

OPPD proposed to revise its commitments regarding the qualifications of personnel performing quality control inspections of activities affecting the fire protection program at FCS. This request was submitted in accordance with the requirements of 10 CFR 50.54(a)(3) as reflecting changes that reduced commitments in the FCS QA Program description previously approved by the NRC.

2.0 EVALUATION

In Section A.11 of the FCS QA program, the guidance regarding inspection of activities affecting fire protection currently states that personnel inspecting fire protection activities are qualified in the design and installation requirements for fire protection. The guidance in this section is based on Attachment 6, "Quality Assurance," Section 4.0.e, to NRC letter entitled, "Fire Protection Functional Responsibilities," (FRACQUA) dated August 29, 1977. Attachment 6, Section 4.0.e, of this document stipulates that measures be taken to assure that personnel responsible for inspection of activities affecting fire protection are independent from the individuals performing the activity being inspected and are **knowledgeable in the design and installation requirements for fire protection** [emphasis added].

In its November 14, 1977, response to the NRC, OPPD provided its position with respect to the fire protection program supplemental guidelines contained in the FRACQUA letter. Subsequently, qualification requirements associated with fire protection personnel were incorporated into the FCS QA program using the term "qualified" rather than "knowledgeable."

In actual practice, however, quality control personnel performing fire protection inspection activities at FCS receive training in the design and installation requirements for fire protection and are knowledgeable to the extent necessary to perform the required inspections, but are not necessarily "knowledgeable" or "qualified" in the design and installation requirements for fire protection in general. Nonetheless, the training and qualification requirements for all personnel performing fire protection inspection activities are consistent with those applicable to personnel

inspecting activities affecting quality at FCS and, therefore, remain in compliance with the requirements of Appendix B to 10 CFR Part 50. Accordingly, OPPD commitments to American National Standards Institute (ANSI) standards associated with training and qualification of inspection, examination, and testing personnel remain unchanged.

3.0 CONCLUSION

Current OPPD commitments to ANSI standards associated with the training and qualification of inspection, examination, and testing personnel (and relied upon by OPPD to satisfy the requirements of Appendix B to 10 CFR Part 50) provide the necessary programmatic controls to ensure that activities affecting fire protection systems/equipment continue to be performed in a manner consistent with the provisions contained in the FRACQUA letter. On this basis, therefore, OPPD's proposal to revise its commitments regarding the qualifications of personnel performing quality control inspections of activities affecting the fire protection program to clarify that inspection personnel will be knowledgeable in the design and installation requirements for fire protection to the extent necessary to perform the inspection, rather than being generally qualified in the design and installation requirements for fire protection is acceptable.

Principal Contributor: J. Peralta

Date: April 12, 2000