UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

January 17, 2002

R. T. Ridenoure
Division Manager - Nuclear Operations
Omaha Public Power District
Fort Calhoun Station FC-2-4 Adm.
P.O. Box 550
Fort Calhoun, Nebraska 68023-0550

SUBJECT: NRC INSPECTION REPORT 50-285/01-05

Dear Mr. Gambhir:

On December 29, 2001, the NRC completed an inspection at your Fort Calhoun Station. The enclosed report documents the inspection findings which were discussed September 30, 2001, through January 2, 2002, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Immediately following the terrorist attacks on the World Trade Center and the Pentagon, the NRC issued an advisory recommending that nuclear power plant licensees go to the highest level of security, and all promptly did so. With continued uncertainty about the possibility of additional terrorist activities, the Nation's nuclear power plants remain at the highest level of security and the NRC continues to monitor the situation. This advisory was followed by additional advisories and, although the specific actions are not releasable to the public, they generally include increased patrols, augmented security forces and capabilities, additional security posts, heightened coordination with law enforcement and military authorities, and more limited access of personnel and vehicles to the sites. The NRC has conducted various audits of your responses to these advisories and your ability to respond to terrorist attacks with the capabilities of the current design basis threat. From these audits, the NRC has concluded that your security program is adequate at this time.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

Kriss M. Kennedy, Chief
Project Branch C
Division of Reactor Projects

Docket: 50-285
License: DPR-40

Enclosure:
NRC Inspection Report
50-285/01-05

cc w/enclosure:
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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket:	50-285
License:	DPR-40
Report No.:	50-285/01-05
Licensee:	Omaha Public Power District
Facility:	Fort Calhoun Station
Location:	Fort Calhoun Station FC-2-4 Adm P.O. Box 399, Hwy. 75 - North of Fort Calhoun Fort Calhoun, Nebraska
Dates:	September 30 through December 29, 2001
Inspectors:	W. Walker, Senior Resident Inspector L. Willoughby, Resident Inspector L. Ricketson, P.E., Senior Health Physicist P. Elkmann, Emergency Preparedness Inspector W. Maier, Senior Emergency Preparedness Inspector J. Hanna, Resident Inspector, Callaway Plant
Approved By:	Kriss M. Kennedy, Chief, Project Branch C
ATTACHMENT:	Supplemental Information

SUMMARY OF FINDINGS

Fort Calhoun Station
NRC Inspection Report 50-285/01-05

IR 05000285-01-05; on 09/30-12/29/2001; Omaha Public Power District, Fort Calhoun Station, Integrated Resident & Regional Report. No findings were identified.

The inspection was conducted by resident inspectors, a region-based health physicist, and two region based emergency preparedness inspectors. The inspection identified no findings. The significance of issues is indicated by their color (Green, White, Yellow, Red) and was determined by the Significance Determination Process in Inspection Manual Chapter 0609. Findings for which the significance determination process does not apply are indicated by No Color or by severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at http://www.nrc.gov/NRR/OVERSIGHT/index.html.

A. Inspector Identified Findings

None.

B. Licensee Identified Findings

A violation of very low significance identified by the licensee was reviewed by the inspector. Corrective actions taken or planned by the licensee appear reasonable. This violation is listed in Section 4OA7.

Report Details

The Fort Calhoun Station began this inspection period at 100 percent power and maintained that level until November 29, 2001. On the afternoon of November 29, 2001, power was reduced to approximately 97 percent when a flow anomaly in the reactor coolant system hot legs affecting delta-temperature power indications on the reactor protection system was observed. The delta-temperature anomaly was investigated and the plant commenced a power ascension to 100 percent on November 30, 2001. The plant remained at full power throughout the rest of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather Protection (71111.01)

a. Inspection Scope

During October 2001, the inspectors reviewed the licensee's Operating Instruction OI-EW-1, "Extreme Weather," Revision 7, for responding to extreme weather, specifically cold weather preparations. The inspectors verified that design features and implementation of the procedure were adequate to protect mitigating systems from the effects of adverse weather.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment (71111.04)

a. Inspection Scope

- The inspectors performed a partial equipment alignment inspection on the Diesel Generator 1 Fuel Oil system on October 16, 2001. The inspectors walked down accessible portions of the system and verified that the system alignment was in accordance with "Fuel Oil Flow Diagram P & ID DWG 11405-M-262 SH. 1," Revision 54.

- On November 27, the inspectors performed a partial inspection of the Diesel Generator 2 Air Start Supply System to verify that all valves were in their required positions for operability of the system. The inspectors compared the position of the valves to the required position as specified in Piping and Instrumentation Drawing, "Starting Air System Schematic DWG B120F07001 SH. 2," Revision 22.

- On December 27, the inspectors performed a partial inspection of the 4.16 kV Auxiliary Power Electrical System, the 480 V Auxiliary Power Electrical System, to verify that all breakers were in their proper positions. The inspectors used Piping and Instrumentation Drawing 11405-E-3, 4.16 kV, Auxiliary Power One

Line Diagram, Revision 19; Drawing 11405-E-4, 480 Volt Auxiliary Power One Line Diagram - Sheet 1, Revision 29; and Drawing 11405-E-5, 480 Volt Auxiliary Power One Line Diagram - Sheet 2, Revision 29.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Routine Fire Protection Inspections

a. Inspection Scope

The inspectors reviewed the following areas to determine if the licensee had implemented a fire protection program that adequately controlled combustibles and ignition sources within the plant, effectively maintained fire detection and suppression capabilities, and maintained passive fire protection features in good material condition. The following areas were reviewed:

- New fuel storage area in the auxiliary building on November 12, 2001
- Diesel-driven auxiliary feedwater room in the turbine building on December 3, 2001
- Control room ventilation room in the control room envelope on December 5, 2001
- Emergency feedwater storage tank room in the control building on December 12, 2001
- East safety injection pump room in the auxiliary building on December 19, 2001

The inspectors assessed these areas and verified that combustibles were being properly controlled in accordance with the following:

- Updated Safety Analysis Report, Chapter 9.11, “Fire Protection System”
- Standing Order SO-G-28, “Station Fire Plan,” Revision 47
- Standing Order SO-G-58, “Control of Fire Protection Impairments,” Revision 29
- Standing Order SO-G-91, “Control and Transportation of Combustible Materials,” Revision 15
- Standing Order SO-G-102, “Fire Protection Program Plan,” Revision 3

b. Findings

No findings of significance were identified.

.2 Annual Inspection of Fire Brigade Drill

a. Inspection Scope

On October 3, 2001, the inspectors observed a fire brigade drill in the control building. The simulated fire scenario involved fighting a fire in the essential battery rooms. This required full dress out in fire gear and required actual use of self-contained breathing apparatus.

b. Findings

No findings of significance were noted.

1R06 Flood Protection Measures (71111.06)

a. Inspection Scope

The inspectors conducted an inspection of the air compressor room, the “C” and “D” Raw Water/Component Cooling Water Heat Exchanger Room and the “B” Shutdown Heat Exchanger Room to verify that the equipment was not subject to damage resulting from internal flooding. The inspectors reviewed the internal flooding analysis performed to demonstrate that the safety-related equipment in the rooms were not vulnerable to internal flooding. They also reviewed the design basis for the site and the contingency actions to verify that the auxiliary building was not vulnerable to external flooding events.

The following documents and calculations were used as criteria for the inspection:

- Probability Risk Assessment Summary Notebook Table 7.1.2, “Summary of Estimated Flood Levels for Auxiliary Building Propagation Paths”
- Updated Safety Analysis Report Section 2.7, “Hydrology,” and Section 9.8, “Raw Water System”
- Repair - Rework Instructions, PE-RR-AE-1000, “Flood Control Preparedness for Floodgates”

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalifications (71111.11)

a. Inspection Scope

On October 9, 2001, the inspectors observed a licensed operator simulator exercise. The simulator exercise evaluated the operator's ability to recognize, diagnose, and respond to equipment problems. The simulator scenario included a reactor coolant pump seal failure, followed by a second reactor coolant pump seal failure. Included in the scenario was a failure of the motor-driven and diesel-driven auxiliary feedwater pumps to start. The inspectors evaluated the operator performance using the following: Emergency Operating Procedure EOC-00, "Standard Post Trip Actions," Revision 5; Emergency Operating Procedure EOP-06, "Loss of All Feedwater," Revision 10; Abnormal Operating Procedure AOP-35,"Reactor Coolant Pump Malfunctions," Revision 1; and Abnormal Operating Procedure AOP-28, "Auxiliary Feedwater Pump Failure," Revision 3.

On October 16, 2001, the inspectors observed a licensed operator simulator exercise. The simulator exercise evaluated the operator's ability to recognize, diagnose, and respond to equipment problems. The simulator scenario included a steam generator pressure instrument failure, a steam generator tube rupture, and two stuck rods on a reactor trip. The inspectors evaluated operator performance using the following: Abnormal Operating Procedure AOP-22, "Reactor Coolant Leak," Revision 9; Abnormal Operating Procedure AOP-05, "Emergency Shutdown", Revision 7; Emergency Operating Procedure EOC-00, "Standard Post Trip Actions," Revision 5; Emergency Operating Procedure EOC-20, "Functional Recovery Procedure," Revision 6; and Technical Specifications.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

During the inspection period, the inspectors reviewed licensee implementation of the maintenance rule. The inspectors verified structure and component scoping, characterization, safety significance, performance criteria, and the appropriateness of goals and corrective actions. The inspectors compared the licensee's implementation of the maintenance rule to the requirements outlined in 10 CFR 50.65, the licensee's administrative procedures, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 2, and summary reports from various expert technical panel meetings. The inspectors reviewed the following components:

- Ventilation and Air Conditioning System components (VA-46A and VA-46B)
- Chemical and Volume Control System Flow Element (FE236)

- Containment Spray Pump SI-3A Discharge Valve
- Emergency Diesel Generator 1 failure to start from manual local pushbutton
- Boric Acid Control Valve unable to control in automatic

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation 71111.13

a. Inspection Scope

The inspectors reviewed the licensee's risk assessments for equipment outages as a result of planned and emergent maintenance to evaluate the licensee's effectiveness in assessing risk for planned and emergent activities. The inspectors compared the licensee's risk assessment and risk management activities against requirements of 10 CFR 50.65 (a)(4) and the recommendations of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 2. The inspectors also discussed the planned and emergent work activities with planning and maintenance personnel. They reviewed and observed emergent work on the following systems/components/activities:

- October 16, 2001 — Activities performed in response to Reactor Protection System A power supply failure
- October 31, 2001 — Troubleshooting of Diesel Generator 1 failure to start from local panel
- November 1, 2001 — Activities performed in response to Component Cooling Water Inlet Relief Valve AC-183 repair
- November 8, 2001 — Activities performed in response to repair of Intake Screen C
- November 29, 2001 — Activities performed to replace Motor-Driven Auxiliary Feedwater Pump FW-6 bearing
- December 12, 2001 — Activities performed in response to Containment Ventilation Filtered Inlet Damper HCV-725A repair

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations 71111.15

a. Inspection Scope

The inspectors reviewed the technical adequacy of an operability evaluation to verify it was sufficient to justify continued operation of a system or component. The inspectors verified that, although equipment was degraded, the operability evaluation provided adequate justification that the equipment could still meet its Technical Specification, Updated Safety Analysis Report, and design bases requirements and that any potential risk increase that contributed to the degradation of equipment was throughly evaluated. The following evaluation was reviewed:

- November 24, 2001 — Low Pressure Safety Injection Pump SI-1B, two of four bolts connecting Suction Valve HCV-2937 air piston operator to the valve bonnet were loose.

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors verified that postmaintenance tests were adequate to verify system operability and functional capabilities. The inspectors verified that testing met design and licensing bases requirements, Technical Specifications, the Updated Safety Analysis Report, inservice testing, and licensee administrative procedures. The inspectors verified testing results for the following components tested on the dates indicated below:

- October 5, 2001 — Raw Water Strainer AC-12B
- October 17, 2001 — Diesel Generator 2
- November 28, 2001 — Diesel Generator 1
- November 29, 2001 — Auxiliary Feedwater Pump FW-6
- December 18, 2001 — Feedwater Sensing
- December 19, 2001 — Containment Isolation Valve HCV-500B

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors observed or reviewed the following surveillance test to ensure the system tested was capable of performing its safety function and to assess its operational readiness. Specifically, the inspectors verified that the following surveillance test met Technical Specifications, the Updated Safety Analysis Report, and licensee procedural requirements.

- December 4, 2001 — Surveillance Test IC-ST-RPS-034, "Quarterly Functional Test of Channel 'A' Axial Power Distribution (APD) Calculator," Revision 11

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors performed a detailed review of the following temporary modification:

- EC#28787 modification that temporarily installed a soft patch on the 5-inch fire protection main piping header at the east end of Corridor 4 about 15 feet above the floor.

The inspectors reviewed the detailed modification package and compared them to the installed configuration in the field. This included reviewing the 10 CFR 50.59 screening against the design basis as specified in the Updated Safety Analysis Report and the Technical Specifications. The inspectors also verified that drawings and procedures were properly updated to reflect the modified configuration of the systems.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

a. Inspection Scope

The inspectors reviewed the objectives and scenario for the 2001 exercise to determine if the exercise would acceptably test major elements of the emergency plan. The scenario included simulated response to an onsite fire, equipment and electrical power

failures, a loss of reactor coolant, a loss of core cooling causing core damage, and a radiological release to the environment to demonstrate the licensee's capabilities to implement the emergency plan.

The inspectors evaluated exercise performance by focusing on the risk-significant activities of classification, notification, protective action recommendations, and assessment of offsite dose consequences in the following emergency response facilities:

- Simulator Control Room
- Technical Support Center
- Operations Support Center
- Emergency Operations Facility

The inspectors also assessed personnel recognition of abnormal plant conditions, the transfer of emergency responsibilities between facilities, communications, protection of emergency workers, emergency repair capabilities, and the overall implementation of the emergency plan to verify compliance with the requirements of 10 CFR 50.47(b) and Appendix E to Part 50.

The inspectors attended the postexercise critiques in each of the above facilities to evaluate the initial licensee self-assessment of exercise performance. The inspectors also attended a subsequent presentation of critique items to plant management.

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level and Emergency Plan Changes (71114.04)

a. Inspection Scope

The inspector reviewed Revision 11A to Section I and Revision 16A to Section J of the Fort Calhoun Station Radiological Emergency Plan, submitted September 21, 2001, against 10 CFR 50.54(q) to determine if the revision decreased the effectiveness of the plan.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS2 ALARA Planning and Controls (71121.02)

a. Inspection Scope

The inspector attended a prejob briefing and observed the movement of a container of radioactive resin within a restricted high radiation area. The inspector also interviewed radiation protection personnel involved in the high dose rate job for information to meet the inspection procedure requirements. Independent radiation surveys of selected work areas within the radiologically controlled area were conducted by the inspector to verify that areas were correctly posted and controlled. The inspector attended the ALARA Committee Meeting conducted October 18, 2001. The following items were reviewed and compared with regulatory requirements:

- ALARA program procedures
- Work control procedure
- Processes used to estimate and track exposures
- Plant collective exposure history for the past 3 years, current exposure trends, and 3-year rolling average dose information
- Three radiation work permit packages from online work activities which resulted in the highest personnel collective exposures during the inspection period (2001-3004, 2001-3014, and 2001-3543)
- Use of engineering controls to achieve dose reductions
- Hot spot tracking and reduction program
- Temporary shielding requests (2001-37, 2001-38, and 2001-41)
- Source term reduction strategy and initiatives
- Radiological work planning
- Self-assessments (CHP-01-20 and SA-10) and surveillance (H3-01-1) which reviewed ALARA performance
- Selected corrective action documentation involving higher than planned exposures and radiation worker practice deficiencies since the last inspection in this area (200102038, 200102506, 200102619, 200102644, 200102659, and 200102754)

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Drill and Exercise Performance

a. Inspection Scope

The inspectors verified a sample of the licensee's reported results for the drill and exercise performance indicator by reviewing records for licensee exercises, actual declared emergencies, drills, and simulator training scenarios conducted from the third calendar quarter of 2000 through the third calendar quarter of 2001 to verify the accuracy of the reported performance indicator data for that period. The inspectors evaluated licensee performance indicator collection and reporting practices against the standards of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline."

b. Findings

No findings of significance were identified.

.2 Emergency Response Organization Readiness Performance Indicator Verification

a. Inspection Scope

The inspectors verified the licensee's reported results for the emergency response organization drill participation performance indicator for the third calendar quarter of 2000 through the third calendar quarter of 2001 by reviewing drill participation attendance records for a sample of 12 key emergency responders. The inspectors evaluated licensee performance indicator collection and reporting practices against the standards of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline."

b. Findings

No findings of significance were identified.

.3 Alert and Notification System Reliability Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors verified the licensee's reported results for the alert and notification system reliability performance indicator by reviewing a sample of offsite siren test results performed from the third calendar quarter of 2000 through the third calendar quarter of 2001 to verify the accuracy of the reported performance indicator data for that period.

The inspectors evaluated licensee performance indicator collection and reporting practices against the standards of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline."

b. Findings

No findings of significance were identified.

.4 Barrier Integrity

a. Inspection Scope

The inspectors verified the accuracy and completeness of the data used to calculate and report selected performance indicators. Specifically, a sampling of control room logs and chemistry data were reviewed for the following performance indicators:

- Reactor coolant system activity
- Reactor coolant system identified leak rate

b. Findings

No findings of significance were identified.

4OA6 Meetings, including Exit

The inspector presented the inspection results to Mr. S. Gambhir, Division Manager, Nuclear Oversight Division, and other members of licensee management at the conclusion of the inspections on October 19, 26, and 29, 2001, and on January 2, 2002.

During each meeting, the licensee management acknowledged the findings presented. Additionally, the inspector asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

4OA7 Licensee Identified Violations

The following finding of very low significance was identified by the licensee and is a violation of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600 for being dispositioned as a noncited violation (NCV).

NCV Tracking Number	Requirement Licensee Failed to Meet
(1) NCV 50-285/01005-01	Technical Specification 5.8.1 requires the implementation of procedures listed in Regulatory Guide 1.33, Appendix A. Standing Order SO-G-101, "Radiation Worker Practices," Revision 17, requires individuals to exit the radiological controlled area immediately if a self-reading dosimeter alarms for any reason. On August 10, 2001, two individuals failed to follow procedural guidance when they failed to exit the radiological controlled area after receiving dose and dose rate alarms. This resulted in the individuals receiving higher than planned doses. This occurrence was documented in the licensee's corrective action program by Condition Report 200102659. This is being treated as a noncited violation.

ATTACHMENT

KEY POINTS OF CONTACT

Licensee

R. Andrews, Special Assignee, Nuclear Operations Division
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J. Chase, Division Manager, Nuclear Assurance
R. Clemens, Plant Manager
S. Coufal, ALARA Technician, Radiation Protection
D. Dryden, Engineer, Station Licensing
M. Frans, Manager, Nuclear Licensing
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H. Sefick, Manager, Security and Emergency Planning
K. Steele, Operations Supervisor, Radiation Protection
C. Simmons, Supervisor, Emergency Planning
C. Williams, ALARA Technician, Radiation Protection

NRC

W. Walker, Senior Resident Inspector
L. Willoughby, Resident Inspector

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed During this Inspection

50-285/01005-01	NCV	Failure to follow procedure and exit RCA after electronic dosimeter alarmed (Section 4OA7)

DOCUMENTS REVIEWED

The following documents were selected and reviewed by the inspectors to accomplish the objectives and scope of the inspection and to support any findings:

Emergency Plan and Implementing Procedures:

N/A	Fort Calhoun Station Radiological Emergency Response Plan	Revision 29
EPIP-OSC-1	Emergency Classification	Revision 34
EPIP-OSC-2	Command and Control Position Actions/Notifications	Revision 39
EPIP-EOF-6	Dose Assessment	Revision 31
EPIP-EOF-7	Protective Action Guidelines	Revision 13
EPIP-EOF-21	Potassium Iodide Issuance	Revision 4

Other Procedures:

EPDM-14	Emergency Preparedness Performance Indicator Program	Revision 3

LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
NCV	noncited violation