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**Omaha Public Power District**  
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December 5, 1988  
LIC-88-1050

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

- References:
1. Docket No. 50-285
  2. Letter from NRC (R. D. Martin) to OPPD (K. J. Morris) dated July 29, 1988
  3. Letter OPPD (K. J. Morris) to NRC (Document Control Desk) dated September 19, 1988 (LIC-88-828)
  4. Letter from NRC (R. D. Martin) to OPPD (K. J. Morris) dated November 14, 1988


Gentlemen:

SUBJECT: Revisions to SALP on Fort Calhoun Station (50-285/88-14)

The Omaha Public Power District (OPPD) reviewed and responded to the Systematic Assessment of Licensee Performance (SALP) report on Fort Calhoun Station (Reference 2), including discussions held at the public meeting on August 19, 1988. In Reference 3, OPPD responded with plans in areas rated a category "3," and to the other areas of SALP performance. Based on recent questions concerning implementation dates on the category "3" areas (Reference 4), OPPD has changed pages to Reference 3 to include implementation dates and to provide status updates where appropriate.

Revisions to those pages provided are denoted by vertical lines in the right hand margin. If you have any questions concerning this matter, do not hesitate to contact me.

Sincerely,



K. J. Morris  
Division Manager  
Nuclear Operations

KJM/sa

Enclosure

- c: LeBoeuf, Lamb, Lieby & MacRae  
R. D. Martin, NRC Regional Administrator  
J. A. Calvo, NRC Project Director  
P. D. Milano, NRC Project Manager  
P. H. Harrell, NRC Senior Resident Inspector

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## B. Radiological Controls

### Recommended Licensee Actions

The radiation improvement program should be finalized with major milestones identified and completion dates established. Management/supervision should ensure that the radiation controls are being properly implemented. The training/retraining program should be fully implemented to ensure personnel have a good understanding of regulatory requirements and plant procedures.

### OPPD's Response

The following actions are being taken to improve OPPD's performance in the area of radiological controls:

#### I. Management oversight and support has been strengthened:

- A. A new Supervisor - Radiation Protection has been designated with over 20 years of industry experience. (completed)
- B. Regular Meetings are held between the Supervisor - Radiation Protection and the Plant Manager in order to ensure adequate support is provided for the program. Monthly meetings are held with the Manager - Fort Calhoun Station, Supervisor - Operations, Supervisor - Maintenance and the Supervisor - Radiation Protection to ensure key departmental support and understanding of program needs. (ongoing)
- C. As a result of recent appraisals, the Radiation Protection organization is being reorganized in order to increase supervisory involvement and technical depth to:
  1. improve attention to detail,
  2. improve problem identification and implement effective corrective actions, and
  3. establish clear functional job descriptions and clarify training and qualification requirements for each position.

The reorganization has been approved with a goal for staffing of March 1, 1989.

#### II. Radiation Improvement Plan (RIP)

- A. Responsibility and management oversight for the RIP has been transferred to the Fort Calhoun Station staff. In addition, the RIP will be incorporated into a larger scale enhancement program described in II.B. below.
- B. A project team has been contracted to accomplish the following:
  1. Accelerate the schedule proposed in the original RIP to ensure long term program improvements are completed in a timely manner,

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B. Radiological Controls (Continued)

2. Upgrade procedures as required to ensure excellence in Radiological Controls,
3. Provide technical assistance during the upcoming outage to ensure program adequacy is maintained, and
4. Provide an assessment and audit function to ensure proper implementation and effectiveness of the RIP as it is phased in during the next 12 months.

These items are also planned for completion by September 1, 1989.

- C. Sixteen new positions have been approved in order to increase staff at both the supervisory and technician level. (completed)

III. Outage Preparation (completed)

- A. Action has been taken to ensure quality Health Physics technicians are available for the 1988 refueling outage.
- B. Radiation protection will provide additional support for maintenance decontamination by using a contractor to maintain cleanliness of containment during the outage.
- C. Key procedures have been identified, and will be upgraded prior to the outage. They include bioassay, air sampling, radiation and contamination survey requirements, personnel contamination, MPC hour tracking, and control of contaminated equipment.
- D. Experienced contractor radiation protection supervisors are being used to support and supplement the OPPD staff during the outage.
- E. Additional radiation protection equipment has been ordered to ensure adequate survey equipment is available, including 20 new ion chambers, six AMS-3s, and a number of air sample devices.
- F. An additional whole body counter has been obtained and is on site for personnel processing and to provide additional support for the outage.

## I. Quality Programs and Administrative Control Affecting Quality

### Recommended Licensee Actions

Licensee management should ensure that plant events are reviewed and that an effective corrective action program is implemented. Management involvement in the area of commitment tracking should be increased to provide a tracking system that will ensure that commitments made to the NRC are timely and accurately completed. Management should take action to ensure that the analyses performed by the technical staff to address operability of plant components and equipment provide an in-depth description of the basis for the conclusions provided by the analyses.

### OPPD's Response

Management has taken the following steps to increase the level of review of plant and operational events:

1. A Safety Review Group (SRG) is being formed which will be tasked with independently assessing the nuclear safety aspects of plant events. The Management Investigative Safety Team (MIST) concept will be continued until the SRG is staffed with qualified personnel. Staffing is scheduled to be completed by March 1989, in accordance with the Independent Nuclear Appraisal schedule.
2. The membership of the Plant Review Committee has been reorganized to include the Manager - Nuclear Safety Review, the Manager - Quality Assurance & Quality Control, the Manager - Training, and the Supervisor - Systems Engineering, in addition to key plant personnel. This has strengthened the committee's safety perspective. (completed)
3. The Safety Audit and Review Committee (SARC) has been restructured to increase its focus on safety and to include outside consultants with a broad experience base in the nuclear power industry. The SARC will also meet more frequently. (completed)
4. Measures to improve the corrective action system include the development of a root cause analysis program and increasing the sense of urgency in addressing and resolving quality assurance program implementation deficiencies. The root cause analysis procedure has been issued.
5. The QA organization plans improvements in its audit and surveillance programs to better address human performance problems; deficiencies in implementation of corporate and station policies and procedures; and program effectiveness. This is scheduled for completion by March 31, 1989.
6. The computerized commitment tracking system has been developed and is operational. Current commitment information has been entered into the system.
7. A System Engineering group at Fort Calhoun will improve OPPD's engineering and technical support capability. Properly trained and qualified system engineers, in conjunction with improved procedures and guidance, will improve the scope, depth, and accuracy of analysis performed by the

I. Quality Programs and Administrative Control Affecting Quality  
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technical staff. New safety analyses for operability or continued operation will be independently evaluated by the QA organization until the Safety Review Group (SRG) is properly staffed. Safety Review Group staffing is scheduled for completion in March 1989 in accordance with the schedule for actions from the Independent Nuclear Appraisal.

8. Operations review comments are very important to OPPD. An informal mechanism for ensuring operations review comments are appropriately resolved has been implemented. A formal operations feedback program was implemented, as noted in Section A, by October 30, 1988.

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K. Training and Qualification Effectiveness (Continued)

1. Conducted an independent assessment of the operator training area. This assessment concentrated on the management of the training programs. This assessment was conducted under the auspices of the Quality and Environmental Affairs Division. An action plan has been developed based on the results of these assessments. The action plan will be completed by December 31, 1989 with exception to licensed operator requalification written exam questions. The questions will be generated in accordance with our previous commitment, of 30 questions per month until a bank of 700 is obtained.
2. Strengthen the management of operator training by retaining an experienced manager with nuclear training experience to serve as an assistant to the Supervisor - Operations and Technical Training. (Completed)
3. Strengthen the overall management of training. A Manager - Training position reporting to the Division Manager - Nuclear Operations was established on July 1, 1988. (Completed)
4. To allow the Supervisor - Operations and Technical Training to concentrate on operator training, the technical training area (STA, technical staff, engineering and management) temporarily report directly to the Manager - Training. This reporting relationship will continue until the Operations training area is strengthened.
5. Authorization has been given to hire an OPPD individual to provide experienced management assistance to the operations training area. (Completed)
6. A method to monitor the effectiveness of training was developed and will be implemented by January 1, 1989, as discussed in the OPPD responses to the Independent Nuclear Appraisal.
7. A minimum of one Fort Calhoun Senior Reactor Operator has been transferred to Training and requisitions have been approved to hire additional operation training instructors to reduce our reliance on contractor-supplied personnel (completed).
8. To strengthen the depth of the understanding of the training process, a course on performance-based training was taught by Mager Associates for ten members of Training in October 1988.

OPPD believes that these actions will significantly improve our performance in the training and qualification effectiveness area.