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Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

November 1, 1991
LIC-91-274R

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

Reference: 1. Docket No. 50-285
2. Letter from NRC (R. D. Martin) to OPPD (W. G. Gates) dated October 4, 1991 (50-285/91-99)

Gentlemen:

Subject: Systematic Assessment of Licensee Performance (SALP) Report
(Inspection Report 50-285/91-99)

On October 22, 1991, Omaha Public Power District (OPPD) met with NRC management to discuss the results of the Systematic Assessment of Licensee Performance (SALP) report for Fort Calhoun Station. OPPD will continue to improve in all SALP functional areas by staying aware of current industry standards and proactively implementing enhancements in the various SALP functional areas. OPPD has prepared written responses to each SALP category and specifically to the two (2) SALP report recommendations, and provides them as the attachment to this letter.

If you should have any question or comments concerning these responses, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/rkj

Attachment

c: LeBoeuf, Lamb, Leiby and MacRae
R. D. Martin, NRC Regional Administrator, Region IV
D. L. Wigginton, NRC Senior Project Manager
~~R. P. Mullikin, NRC Senior Resident Inspector~~

Attachment

SALP RECOMMENDATIONS & RESPONSES November 1991

Plant Operations

NRC Recommendation: Management should continue with the efforts already in process for increasing the number of licensed, on-shift operators and upgrading of emergency operating procedures. Operations management should become more proactive in providing guidance and direction to operations personnel.

OPPD Response: With the current licensed operator training classes in progress, OPPD will significantly increase the number of licensed operators by July 1992. The EOP/AOP upgrade continues to progress well and is on track for a June 1992 completion. During the current SALP period, management will focus on continued implementation of improved Operations standards.

The SALP report also discusses a plant shutdown due to a reactor coolant pump seal failure. In this discussion it was noted that "operations management direction and preplanning for a catastrophic failure of the seal was not apparent." During the actual shutdown the appropriate procedures were reviewed and discussed by the on-shift crew. Additional emphasis will be placed on anticipating the need for procedure review prior to actual plant actions when circumstances indicate a degrading condition.

Radiological Controls

NRC Recommendation: None

OPPD Response: We have continued to work hard in this area to maintain a program that exceeds industry standards. Continued enhancements, including the 10 CFR 20 rule changes, will be fully supported.

Maintenance/Surveillance

NRC Recommendation: None

OPPD Response: Strong management support for these programs will continue. Emphasis will be placed on improving maintenance work practices.

Emergency Preparedness

NRC Recommendation: Management should provide the appropriate oversight to ensure that weaknesses identified during emergency exercises are promptly addressed and comprehensive corrective actions are implemented.

OPPD Response: All three weaknesses from the May 1991 Exercise have been addressed and corrective actions implemented. Management will continue to provide strong support for this area. OPPD will continue to encourage identification and correction of weaknesses identified during quarterly drills and through Quality Assurance audits and surveillances of this area.

Security

NRC Recommendation: None

OPPD Response: Management commitment to a strong and proactive security program will continue.

Engineering/Technical Support

NRC Recommendation: None

OPPD Response: A commitment to engineering excellence through support of safe plant operation remains our goal in this area.

Safety Assessment/Quality Verification

NRC Recommendation: None

OPPD Response: Safety continues to be our number one priority. This safety first philosophy is embodied in the operation and maintenance of Fort Calhoun Station.