

NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
License: DPR-40
EA 94-267

During an NRC inspection conducted November 14 through December 27, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Criterion III, Appendix B of 10 CFR Part 50, states, in part, that measures shall be established to assure that applicable regulatory requirements and the design basis for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, on November 14, 1994, the licensee determined that a 1988 control room air conditioning unit design modification had not correctly translated the design basis specifications for assuring system operability during certain design basis accidents. As a result, the control room air conditioning units that were purchased and installed were not capable of operating within the component cooling water maximum temperatures following a postulated main steam line break inside the containment or a large break loss of coolant accident. This condition has existed since 1988. (01013)

- B. Criterion V, Appendix B of 10 CFR Part 50, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . and shall be accomplished in accordance with these instructions, procedures, or drawings. .

The Fort Calhoun Quality Assurance Plan, Revision 3, Section 2.1, paragraph 4.2.1, states, in part, that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

Standing Order SO-R-4, Station Incident Reports, Revision 44, Section 2.4.5 requires an incident report for violations of established system design bases (Updated Safety Analysis Report [USAR] or Design Bases Document).

Nuclear Operations Division Procedure NOD-QP-31, Revision 8, Section 6.16, requires that nonroutine events and conditions which may require operability and reportability determinations be documented by an incident report per Standing Order SO-R-4. Section 7.1 states that determinations of operability and reportability will be performed using the guidance in this procedure and will be implemented through Standing Order SO-R-4, Station Incident Reports.

Contrary to the above, on October 5, 1994, an incident report was not initiated, after the licensee was notified, for a violation of the established control room air conditioner design basis or to perform the

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required operability and reportability determinations. The required incident report was subsequently initiated on November 15, 1994, following the licensee's determination that the control room air conditioning units would be rendered inoperable during a large break loss of coolant accident or a main steam line break inside the containment. (01023)

This is a Severity Level III problem (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, the Omaha Public Power District is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Arlington, Texas,
this 15th day of February 1995

