



## Omaha Public Power District

1623 HARNEY • OMAHA, NEBRASKA 68102 • TELEPHONE 536-4000 AREA CODE 402

September 28, 1979

Mr. Glen L. Madsen  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011

Reference: Inspection Report 50-285/79-10

Dear Mr. Madsen:

In response to the above-referenced inspection report, the Omaha Public Power District herein submits comments to indicate the status of the reported item of non-compliance.

### Infraction

Based on the results of an NRC inspection conducted July 30-31, 1979, it appears that one of your activities was not conducted in full compliance with NRC requirements as indicated below:

Item H of Appendix E to 10 CFR 50 requires that training be provided to employees who are assigned specific authority and responsibilities in the event of an emergency. This requirement is further amplified by Section VII-VIII of your Emergency Plan which states, in part: "All plant operation, technical and maintenance personnel are trained in emergency procedures and monitoring duties.... Annual retraining will be conducted in order to maintain personnel proficiencies."

Contrary to the above, retraining was not conducted for two Emergency Duty Officers and two Emergency Monitoring Team members for the period December 1, 1977, through July 30, 1979.

### Response

- (1) Corrective steps which have been or will be taken by you and the results achieved.

At the time of the Emergency Duty Officer (EDO) retraining class, the two designated EDO's in question were unable to attend. They were to be retrained at a later date; however, their retraining was subsequently overlooked. Since the date of the inspection, one of the designated EDO's in question has been promoted to another position within

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the District and is no longer a member of the Plant Staff. His replacement is presently a trained EDO. The need of the second designated EDO in question to actually be a trained EDO has been reviewed and the determination made that he should be removed from the EDO roster. As a result of his position, Supervisor - Field Maintenance, it was determined that he would be more useful as a maintenance consultant in an accident situation.

At the time of the inspection, no record of retraining could be found for the two Emergency Monitoring Team members in question. Even though no particular retraining records could be found, a memorandum from the Health Physics group to the Training Coordinator dated June 25, 1979, was found which stated that all monitor team retraining for 1979 had been completed. Since the date of the inspection, discussion with the instructor and the two team members in question indicates that the retraining was conducted and that a lecture record was forwarded to the Training Coordinator. Apparently, the lecture record was misplaced. Since completion of the retraining has been verified by several persons, a duplicate lecture record has been placed in the appropriate training files.

(2) Corrective steps which will be taken to avoid further violations.

As noted in item (1) above, a review of designated EDO personnel has indicated that the position of Supervisor - Field Maintenance should be removed from the EDO roster. The necessary procedure changes will be made to effect this deletion. In order to ensure that all EDO's receive their annual retraining in the future, the Training Coordinator will maintain a running list of all EDO's and their training; the goal is to ensure that all EDO's receive annual retraining and that the training records are maintained complete.

In order to ensure that all Emergency Monitor Team members receive their annual retraining and that the training records are maintained complete, the training department will audit the training records following the completion of all scheduled Monitor Team retraining. The goal of the audit will be to verify that all personnel on the Emergency Monitor Team roster have received their annual retraining and that the training records are complete.

(3) The date when full compliance will be achieved.

All present members of the Emergency Monitor Team have received their 1979 annual retraining.

1295 231

Mr. Glen L. Madsen  
September 28, 1979  
Page Three

The necessary procedure changes to correct the Emergency Duty Officer deficiency will be completed by October 15, 1979. At that time, the District will be in full compliance.

Sincerely,

*WCJ*

W. C. Jones  
Division Manager  
Production Operations

WCJ/SCS/LTK:jmm

cc: LeBoeuf, Lamb, Leiby & MacRae  
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1295 232