

Omaha Public Power District
Fort Calhoun Station
Docket No. 50-285
License No. DPR-40

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of January 12-15, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 50.59(2)(b) requires that holders of a license provide a report to the appropriate NRC Regional Office on the performance of any "tests or experiments not described in the safety analysis report," and that this report contain "a brief description of such . . . tests and experiments, including a summary of the safety evaluation of each."

Contrary to the above, the licensee failed to provide the summaries of the safety evaluations as part of the monthly report section covering tests and experiments for the period August 1979 to September 1980.

This is a Severity Level V Violation. (Supplement I.E)

- B. Technical Specification 5.4.1 requires that, "A retraining and replacement training program for the plant staff . . . shall meet or exceed the requirements of Section 5.5 of ANSI N18.1-1971" Section 5.5 of ANSI N18.1-1971 requires that "A training program . . . be established which maintains the proficiency of the operating organization . . .," where the operating organization is defined in section 3.2 as "onsite personnel concerned with the day to day operation, maintenance and certain technical services." The training program for the Fort Calhoun Station is described in the FCS Training Manual, revised August 16, 1980 and identifies the requirements for "General Employee Training and Retraining, Departmental Training, Emergency Training, and Fire Brigade Training."

1. Section B.2.1 requires "an annual refresher training session and an examination" with regard to radiation protection.

Contrary to the above, approximately 250 OPPD personnel, holding current badges for the Fort Calhoun Station, have gone more than one year without this training.

2. Section B.2.1 requires that those personnel "who have security classifications which allow unescorted access to the Ft. Calhoun Station" be given "Site Security refresher training each calendar year in order to maintain their classification."

Contrary to the above, approximately 375 OPPD personnel holding current badges for the Ft. Calhoun Station failed to undergo refresher training in 1980.

3. Section B.2.4 requires that the licensee schedule and conduct "quarterly fire drills involving the entire plant staff."

Contrary to the above, Ft. Calhoun Station had no plant-wide fire drills scheduled for 1980, and had only one fire incident that involved the entire plant staff that was recorded for training purposes.

4. Section B.2.8 requires that "an annual schedule detailing General Training and Retraining, Departmental Training and Retraining and special training events" be prepared and "published each December for the following year."

Contrary to the above, no annual schedule for General Training and Retraining had been published for 1981.

5. Sections C.4.1.1 and C.4.2.1 require the licensee to schedule "approximately 30 hours of lecture" each year for the Mechanical and Electrical crafts, respectively.

Contrary to the above, no schedule for this type training was issued for 1980.

6. Sections C.4.1.1 and C.4.2.1 require that craftsmen "attend an annual lecture series consisting of topics from the following:

- Appropriate Technical Topics
- Plant Systems and Components
- Administrative Procedures
- Technical Specifications
- Changes to Facility Design
- Changes to the Facility License
- Quality Assurance and Control"

Contrary to the above, a review of selected training records of five craftsmen and interviews by the inspector indicated that these individuals did not attend required departmental training lectures in 1980.

7. Section D.2.1 requires that persons selected as Emergency Duty Officers be "instructed in the entire Emergency Plan," be given an

"examination prepared by the Supervisor-Chemistry and Radiation Protection," and demonstrate their "ability to perform the duties of EDO under drill conditions" as documented on "an Emergency Duty Officer Training Checklist." In addition, Section D.2.5.2 requires that the Supervisor-Chemistry and Radiation Protection (C&RP) prepare "an examination on the Emergency Plan for Emergency Duty Officer training."

Contrary to the above, three licensed personnel were identified by position on Figure V 1 of the FCS Emergency Plan as Emergency Duty Officers, but had not received the required training. In addition, the Supervisor, C&RP had not prepared an examination on the Emergency Plan for EDO training.

This is a Severity Level IV Violation. (Supplement I.D.3)

- C. Technical Specification Section 5.4.1 states, "a retraining and replacement training program for the plant staff shall be maintained under the direction of the Training Coordinator and shall meet or exceed the requirements of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55."
1. 10 CFR 55, Appendix A, paragraph 2 states, "The requalification program shall include preplanned lectures on a regular and continuing basis throughout the license period in those areas where annual operator and senior operator examinations indicated that emphasis in scope and depth of coverage is needed in the following subjects:
- Theory and Principles of Operation
 - General and Specific Operating Characteristics
 - Plant Instrumentation and Controls
 - Plant Protection Systems
 - Engineered Safety Systems
 - Normal, Abnormal and Emergency Operating Procedures
 - Radiation Control and Safety
 - Technical Specifications
 - Applicable portions of Title 10, Code of Federal Regulations.

Contrary to the above, the requalification examination for SROs did not cover the required subjects and therefore weak areas could not have been identified. Further, the 1980 RO and SRO requalification examination was not evaluated to indicate those areas that needed emphasis in scope and/or depth.

2. 10 CFR, Part 55, Appendix A, paragraph 3.d states, "The requalification program shall include on the job training so that each licensed operator and senior operator reviews the contents of all abnormal and emergency procedures on a regularly scheduled basis."

Contrary to the above, all licensed operators and senior operators had not reviewed all the abnormal and emergency procedures in calendar year 1980. Further, the licensee did not have a method to ensure that these reviews were completed as required.

3. 10 CFR, Part 55, Appendix A, paragraph 4.b states, "The requalification program shall include written examinations which determine licensed operator's and senior operator's knowledge of subjects covered in the requalification program and provide a basis for evaluating their knowledge of abnormal and emergency procedures."

Contrary to the above, written examinations were not administered on subjects covered in the requalification program during calendar year 1980. Further, one licensed operator scored less than 80% correct in the area of radiation control and safety did not attend a requalification lecture in this area and was not reexamined in this area.

4. 10 CFR, Part 55, Appendix A, paragraph 4.c states, "The requalification program shall include a systematic observation and evaluation of the performance and competency of licensed operators and senior operators by supervisors and/or training staff members including evaluation of actions taken or to be taken during actual or simulated abnormal and emergency conditions."

Contrary to the above, the licensee had not performed a systematic evaluation of the performance (including actions taken or to be taken during actual or simulated abnormal and emergency conditions) of licensed operators and senior operators.

This is a Severity Level IV Violation. (Supplement I.D.3)

- D. Technical Specification 5.10.2 states, "The following records shall be retained for the duration of the Facility Operating License:

"i. Records of Quality Assurance Activities required by the QA Manual."

Quality Assurance Procedure (QAP) #7, paragraph 3.1, states, "Records shall be retained that furnish evidence of activities affecting quality." Paragraph 3.3 states, "The records listed in Appendix A (to QAP #7) shall be accumulated and handled in a controlled manner" Appendix A to QAP #7 lists "Records of individual plant staff members indicating qualifications, experience, training and retraining.

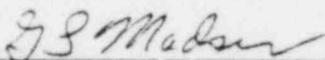
Technical Specification 5.4.1 requires the licensee to conduct a retraining program which "meets or exceeds the requirements of 10 CFR 55, Appendix A. 10 CFR 55, Appendix A, states "The requalification training program shall include on-the-job-training so that each licensed operator and senior operator is cognizant of facility design changes, procedure changes and facility license changes."

Contrary to the above, no records were maintained which documented that all licensed operators were cognizant of procedure changes, facility design changes and facility license changes 48, 49, 50, 51, 52 and 53.

This is a Severity Level V Violation. (Supplement I.E)

Pursuant to the provisions of 10 CFR 2.201, Omaha Public Power District is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated 2/5/81



G. L. Madsen, Chief
Reactor Operations and
Nuclear Support Branch