

Appendix A

NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket 50-285
License DPR-40

Based on the results of an NRC inspection conducted during the period of March 23-27, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

A. Failure to Maintain Sufficient Records to Furnish Evidence of Activities Affecting Quality

10 CFR Part 50, Appendix B, Criterion XVII requires that sufficient records shall be maintained to furnish evidence of activities affecting quality.

Contrary to the above, the licensee representatives stated that records were not available for the following activities affecting quality.

1. Records of supplier performance used by the licensee as the basis of initial supplier approval at the inception of the licensee's supplier approval program in compliance with licensee Procedure QAP No. 5, Revision 1, "Supplier Qualification, dated December 1, 1980.
2. Documentation of continuing training of licensee Quality Assurance personnel accomplished in compliance with licensee Procedure QAP No. 19, Revision 0, "Indoctrination and Training of Quality Assurance Personnel," approved April 25, 1977, since the inception of this requirement.
3. Records of any of the annual reviews of the licensee Quality Assurance Manuals and of the periodic reviews of all licensee Quality Assurance Procedures (QAPs) accomplished in accordance with the licensee Quality Assurance Manual.

This is a Severity Level V violation (Supplement I.E.). (8107-01)

B. Failure to Comply With Technical Specifications

Licensee Technical Specification 5.5.1.8 requires Safety and Audit Review Committee (SARC) audit of facility activities in general, and specifically:

- "a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.

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- "b. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months."

Contrary to these requirements, based on SARC audit reports for the years 1978, 1979, and 1980, the SARC neither audited all provisions of the Technical Specifications at least once a year, nor audited at least once per six months the results of all actions taken to correct deficiencies such as actions taken to correct "nonconformance reports."

This is a Severity Level V violation (Supplement I.E.). (8107-02)

C. Failure to Follow Procedures

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

1. Licensee QAP No. 17, Revision 1, "Audit Planning, Performance, and Reporting," requires a response to licensee audits within 30 days.

Contrary to the above, response to licensee Audit Report 27-80 documented by Deficiency Report FCI-80-A-0044 was made in 43 days in lieu of the required 30 days.

2. Licensee QAP No. 18, Revision 0, "Auditor Training and Qualifications," requires auditors to pass an examination.

Contrary to this requirement, one auditor performing miniaudits of surveillance testing was not qualified by examination.

3. Where auditor examination is delegated to an independent certifying agency, licensee Procedure QAP No. 18 requires that the Manager-Quality Assurance ". . . shall retain responsibility for conformance of the examination and its administration to this standard."

Contrary to the above, licensee representatives stated that verification of conformance standards of examinations and their administration had not been accomplished at anytime.

This is a Severity Level V violation (Supplement I.E.). (8107-03)

D. Failure to Take Prompt Corrective Action

10 CFR Part 50, Appendix B, Criterion XVI states that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, based on reports of SARC audits for 1978, 1979, and 1980, and especially the report of SARC Audit 5-80, the licensee has not established procedures to promptly correct conditions adverse to quality as evidenced by Attachments 2 through 5 of the licensee's report, dated December 18, 1980, of SARC Audit 5-80.

This is a Severity Level V violation (Supplement I.E.). (8107-04)

E. Failure to Audit All Aspects of the Quality Assurance Program

10 CFR Part 50, Appendix B, Criterion XVIII states that a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the Quality Assurance Program. The licensee internal audit program is defined in licensee Quality Assurance Procedure No. 2, Revision 0, "Quality Plans," approved April 25, 1977.

Contrary to the above, the licensee neither included in QAP No. 2 an audit plan for his supplier control program, nor had he performed an internal audit of his compliance with this program.

This is a Severity Level V violation (Supplement I.E.). (8107-05)

Pursuant to the provisions of 10 CFR Part 2.201, Omaha Public Power District is hereby required to submit to this office within 30 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. Consideration may be given to extending your response time for good cause shown.

Dated May 15, 1981

for B. M. Hennicutt
G. L. Madsen, Chief
Reactor Projects Branch