Omaha Public Power District
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402/536-4000

January 10, 1990
LIC-89-1201

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

References: 1. Docket No. 50-285
2. Letter from OPPD (K. J. Morris) to NRC (Document Control Desk) dated November 15, 1989 (LIC-89-1023)

Gentlemen:

SUBJECT: Supplemental Information Concerning Status of Human Engineering Discrepancies (HEDs) 113 and 263

The purpose of this letter is to respond to questions raised in a December 1, 1989 telephone conversation between the NRC and Omaha Public Power District (OPPD). Specifically, this letter explains why HEDs No. 113 and No. 263 in Reference 2 are no longer considered to be Human Engineering Discrepancies.

Enclosed please find OPPD's revised resolutions to HED Nos. 113 and 263. The revisions are denoted by vertical lines in the right hand margin.

If you should have any questions, please contact me.

Sincerely,

K. J. Morris
Division Manager
Nuclear Operations

KJM/pjc

Enclosures

c: LeBoeuf, Lamb, Leiby & MacRae
R. D. Martin, NRC Regional Administrator, Region IV
A. Bournia, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector

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FORT CALHOUN STATION

DETAILED CONTROL ROOM DESIGN REVIEW

HED FINAL RESOLUTION

HED NO. 113

HED #113 states that the neon indicator lights are "hard to see." This HED previously had a criticality rating (error potential, plant impact) of 2, 2. MR-FC-85-143 was initiated to correct this human engineering discrepancy.

The criticality rating of this HED has since been re-evaluated, and OPPD has determined that the rating should have been a 4, 4. The following gives a history of the devices and an explanation for why the criticality rating was changed:

In 1976, the neon indicating lights were installed to prevent randomly induced noise spikes from tripping the Reactor Protection System (RPS). During installation of the neon lights, extensive trouble shooting was conducted to maintain the illumination level as high as possible while eliminating noise spikes in the RPS.

The thirteen sets of indicating lights listed in HED #113 involve the Raw Water/Component Cooling Water (RW/CCW) and Chemical and Volume Control systems.

1) Twelve of the thirteen sets of lights referenced are status lights for RW/CCW header pressure. These lights serve to warn Operations staff when the header pressure falls below desired pressure.

   Status of RW/CCW header pressure is properly displayed (per NUREG 0700 guidelines) on flow indicators (FI-2890, FI-2891) and on a pressure indicator (PI-2892 located on CB-10/11). RW/CCW header pressure and flow are also annunicated in annunciator A-1 located on the upper section of CB-10/11. The subject indicating lights are not needed for normal, abnormal or emergency operation. They serve as additional informational aides to the operators. Therefore, these lights are not considered safety related.

2) The last set of lights referenced provide valve position indication (open/closed) for HCV-239.

   There is "off-normal status" and "closed signal failure" annunciation for the shutdown cooling valves in annunciator A2 on CB-10/11. Indication of this valve is not required per Regulatory Guide 1.97. Therefore, these lights are not considered safety related.

CRITICALITY RATING

The criticality rating is made up of two numbers, a categorization number and a prioritization number both of which range from one (high criticality) to four (low criticality).

The categorization number for HED #113 was originally determined to be two, which indicated that this human engineering discrepancy had (1) a low potential for error and (2) was safety related (as explained in Fort Calhoun Control Room Design Review Summary Report Section 2.3.2).

Re-evaluation of the thirteen sets of subject indicating lights against the Plant impact criteria (Section 2.3.2.2) determined that the lights are non-safety related and have a low potential for error, as originally determined (Section 2.3.2.1). Therefore, the categorization number was changed from two to four.

The prioritization number for HED #113 was originally determined to be two. The HED was reviewed against the criteria for establishing a prioritization number (Section 2.3.3). A prioritization number of 4 is appropriate since:

- Changing the neon indicating lights back to the original configuration (incandescent lights) could result in randomly induced noise spikes.
- A major control room redesign effort would be required to correct the HED. Since the HED is non-safety related, a major design expenditure is not justifiable.

In conclusion, this HED has been re-evaluated and a new criticality rating of 4, 4 established. As a result of the low safety concern and the expected high cost of design correction implementation, a modification is not justified.

Modification MR-FC-85-143 has been cancelled and no further action is required.

FORT CALHOUN STATION

DETAILED CONTROL ROOM DESIGN REVIEW

HED FINAL RESOLUTION

HED NO. 263

Description of Discrepancy

The use of neon bulbs does not provide enough illumination to determine what state the equipment is in.

HED No. 263 is no longer considered to be a Human Engineering Discrepancy. See Final Resolution for HED No. 113