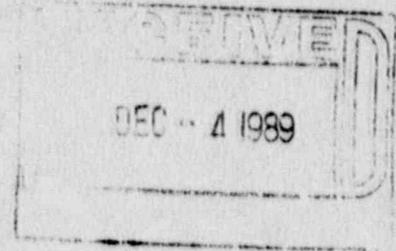


Omaha Public Power District
1623 Harney Omaha, Nebraska 68102 2247
402/536-4000

November 30, 1989
LIC-89-1126



Mr. Robert D. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

- References: 1. Docket No. 50-285
2. Letter from NRC (J. L. Milhoan) to OPPD (K. J. Morris) dated October 31, 1989

Dear Mr. Martin:

SUBJECT: Assessment of the Safety Enhancement Program Verification and Validation Process

Reference 2 had as an enclosure NRC Assessment Report 50-285/89-37. During performance of the assessment, seven open items were identified. In Reference 2, NRC requested OPPD to provide a response to each of the seven open items within 30 days. The attachment to this letter provides the requested response.

The NRC expressed concern with the relatively large number of weaknesses classified as significant, the failure to be proactive in informing the NRC on the status of the weaknesses, the lack of a proceduralized program to address the verification and validation process, the failure to establish acceptance criteria for an acceptable method for institutionalization of items in the Safety Enhancement Program (SEP), and the failure to establish a program for revalidation of identified weaknesses. OPPD believes a satisfactory resolution of each of these concerns is described in the enclosure as part of the specific response to the seven open items.

OPPD wishes to confirm our commitment to a strong and proactive Safety Enhancement Program. Extensive resources have been, and are being devoted to develop programs and upgrade plant facilities to improve and assure safe operation of the Fort Calhoun Station. All levels of management have been enjoined to maintain and enhance the SEP programs without diluting the efforts expended in maintaining existing programs.

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If you should have any questions, please contact me.

Sincerely,



K. J. Morris
Division Manager
Nuclear Operations

KJM/pjc

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

Response to Open Items
NRC Assessment Report 50-285/89-37

Open Item 285/8937-01

NRC Concern:

Inclusion of the verification and validation process into a formally issued procedure would ensure that management maintains control over the verification and validation process so changes could not be made without management approval.

OPPD Response:

Procedure, NOD-QP-28, "Safety Enhancement Program", was issued on November 30, 1989. This procedure institutionalizes the Verification and Validation process, which includes format control of the entire SEP. It provides checklists and defines a step by step means to accomplish the verification and validation processes. It addresses a tracking process for items identified by verification and validation as well as training and documentation requirements.

Open Item 285/8937-02

NRC Concern:

The inspector noted that the licensee had not provided any direction or acceptance criteria to the individuals performing validation activities as to what constituted acceptable institutionalization. Due to the absence of specific criteria, each individual was establishing his/her own set of standards; therefore, inconsistent criteria were being applied.

The licensee should establish and document the criteria for acceptable institutionalization for use by the individuals during the validation process.

OPPD Response:

As noted above, NOD-QP-28, "Safety Enhancement Program", was issued on November 30, 1989. This procedure defines the criteria required to institutionalize an item as one or more of the following:

1. Any procedures or documents which were issued or revised to complete the SEP item must reference the SEP item number in the documents and specifically note that the procedure or document is SEP related.
2. The procedure which controls the documents referencing the SEP item must include a note that prior to revising a document referencing and SEP item, the new revision must be checked to verify that the intent of the SEP commitment is not changed. Procedures identified as requiring this reference will be changed to include it at the time of the next routine are pending revision.
3. The verifier must provide the Manager - NL&IA a list of all documents which institutionalized the SEP item.

Open Item 285/8937-03

NRC Concern:

Once the institutionalization criteria have been established, the licensee should revalidate all SEP items that were previously completed to ensure adequate institutionalization had been performed. As discussed in paragraph 2.e of this report, the licensee established a tracking system to ensure that all weaknesses identified during the validation process were formally addressed by the individual responsible for implementation of the SEP item. However, the inspector noted a problem where an SEP item had not been properly institutionalized and no action item was entered into the tracking system. For this reason, it appeared the revalidation of the institutionalization of all completed SEP items is appropriate.

OPPD Response:

The Procedure, NOD-QP-28, "Safety Enhancement Program", was issued on November 30, 1989, and requires the Verification and Validation of completed SEP items as well as the appropriate resolution of identified weaknesses. It does require revalidation after weakness closure. OPPD does intend to conduct revalidation of SEP items previously closed which contained weaknesses. This revalidation will assure the weaknesses have been corrected. The method of revalidation and its applicability to specific SEP items will be provided to the NRC in the Safety Evaluation Program - Monthly Report for January, 1990.

Open Item 285/8937-04

NRC Concern:

The inspector reviewed the status of the V&V process for SEP Item 63, "Complete Safety-Related Vendor Manual Upgrade Project," and noted that the licensee had statused the item to the NRC as closed. The scope of work for this item contained a Phase I and Phase II work scope that identified specific actions that would be completed by the licensee. During review of the item, the inspector noted that Phase I had been completed; however, it appeared that Phase II had not been completed. Based on the documentation reviewed by the inspector, it appeared that the scope of work contained in Phase II would not be completed until approximately 1991.

It is requested that the licensee provide a response to this apparent inconsistency between reporting to the NRC that SEP Item 63 had been completed, and documentation indicating that the Phase II work scope may not have been completed. The response should also contain a discussion of the licensee's review of other items to verify that the item status provided to the NRC is accurate.

OPPD Response:

Procedure NOD-QP-28, "Safety Enhancement Program", defines "completed" as the status of a SEP item which is ready for the validation process to begin. Apparent non-completion of Phase II work has been identified as a significant weakness and a Quality Assurance Deficiency Report was written against item 63 to assure corrective action is taken if required. NOD-QP-28 requires that every SEP item reported as complete undergo the verification and validation process. Weaknesses, significant or otherwise, are then required to be corrected in order to ensure proper implementation of the Safety Enhancement Program. This item was identified during the validation process prior to the NRC inspection.

Open Item 285/8937-05

NRC Concern:

The inspector reviewed SEP Item 60, "Improve Controls Over Surveillance Test Program," and noted that the scope of work for the item appeared to have been changed. In response to an NRC Operational Safety Team Inspection, the licensee added to the scope of work to include an action to revise Procedure SO-G-7, "Operating Manual," to address the requirements for verbatim compliance.

The inspector noted, during review of this item, that the individual performing the verification and the individual performing the validation had not been informed of the change in the work scope.

Consequently, the portion of the scope of work related to verbatim compliance was not verified or validated.

It is requested that the licensee provide a response to this item discussing what actions will be taken to ensure that a proper verification and validation is performed when the work scope of an SEP item has been revised. The response should also include a discussion of the review performed by the licensee to identify other items where the work scope has changed, if any, and how the items will be properly verified and validated.

OPPD Response:

OPPD Safety Enhancement Program, Revision 1, April, 1989 is the current document containing commitments to the NRC regarding the SEP Program. It is supplemented by additional explanations and commitments made to the NRC in written communications since April, 1989. Revision 2 to the SEP will be issued by February 1, 1990 to incorporate the commitments made since Revision 1 was issued. Any change in the work scope of a SEP item not so documented is considered by OPPD to be outside of committed activities and is not subject to verification or validation as part of the SEP process. Nevertheless, additional work may be performed above and beyond the SEP commitment made to

the NRC to further enhance the operation of the Fort Calhoun Station. If such work is performed concurrent with or as an addition to a SEP item, as is the case in this concern, it may be reported to the NRC for information purposes only and will not be subject to the V&V process.

Open Item 285/8937-06

NRC Concern:

The licensee had identified 96 weaknesses in the tracking system for review by the responsible individual. During review of the weaknesses, the inspector identified the following:

- (1) The licensee has not taken a proactive approach to keeping the NRC informed on the significance and types of weaknesses being identified during the validation process.
- (2) The licensee has not established a program to address how the weaknesses will be revalidated to ensure that the actions required to be taken by the assigned individual have been properly completed.

OPPD Response:

Part 1: The significance of identified weaknesses is determined by the Manager, Nuclear Licensing & Industry Affairs, with the concurrence of the Manager, Quality Assurance & Quality Control, in accordance with the requirements of NOD-QP-28, "Safety Enhancement Program." The Safety Enhancement Program - Monthly Status Report submitted to the NRC each month, beginning with the December submittal, will provide information on the status of each SEP item and will include information on all identified weaknesses. For Significant Weaknesses, both the text and presentation status sheets contain a description of the weakness and the action being taken to assure proper corrective action is taken.

Part 2: NOD-QP-28, "Safety Enhancement Program", requires that significant weaknesses be corrected and that a Quality Assurance Deficiency Report be written against the associated SEP item to assure proper corrective action is taken. Both significant and less than significant weaknesses are considered resolved only after review by the Manager, NL&IA, and the Manager, QA&QC. These administrative controls should make certain that identified weaknesses are appropriately resolved. As stated in the response to Open Item 285/8937-03, revalidation of the SEP item relating to the identified weakness(es) will be conducted.

Open Item 285/8937-07

NRC Concern:

The licensee performed a review of all 96 weaknesses identified to date. The licensee initiated the review of the weaknesses due to concerns identified by the inspector of the relatively large number of weaknesses. The review indicated that the majority of the weaknesses related to relatively minor problems such as the individual not signing Form FC-1077, "Certification of Accuracy," or the institutionalization of the item not being completed. Form FC-1077 was required to be signed by the individual assigned the verification of an item as a certification that the item had been fully completed. The licensee identified 23 weaknesses that were significant. The weaknesses were classified as significant because the SEP actions were not completed or the SEP work scope was not met. The licensee stated that a QA deficiency report (DR) would be issued for each significant weakness identified. The DR process is being used since the process had been fully proceduralized.

It is requested that the licensee provide a response that discusses the significant weaknesses that were identified and the actions that will be taken to correct the weaknesses.

OPPD Response:

As a result of the issue of NOD-QP-28, "Safety Enhancement Program", the Manager, NL&IA and the Manager, QA&QC have reviewed the significance of the 23 weaknesses denoted as significant in NRC Assessment Report 50-285/89-37. As a result of this review, 18 of the items were found to be lacking in significance (they did not directly impact the implementation of the associated SEP item). The remaining five significant weaknesses have been identified to the NRC as discussed in the OPPD response to Open item 285/8937-06, above.