



## Omaha Public Power District

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

February 6, 1981  
FC-011-81

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

Reference: (1) Docket No. 50-285  
(2) Fort Calhoun Station Health Physics Appraisal Report  
No. 50-285/80-16, Dated December 12, 1980

Dear Mr. Seyfrit:

In reply to the Notice of Violation contained within the above referenced report, the Omaha Public Power District herein submits comments to indicate the status of the reported items of noncompliance.

### Noncompliance

- A. Technical Specification 5.3.1 requires in part, that "Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions,...." Section 4.5.2 of ANSI N18.1-1971 states, in part, "Technicians in responsible positions shall have a minimum of two years working experience in their speciality."

Contrary to the above requirement, at the time of the appraisal, one technician performing shift responsibility had approximately one year of related work experience.

### Response

- (1) Corrective steps which have been taken and the results achieved.

The item of noncompliance does not fully describe the circumstances surrounding the cited violation. The technician in question was a contract employee performing in the capacity of a shift technician at the Fort Calhoun Station. As of October 1, 1980, this individual was about 200 hours short of meeting the two-year experience requirements prescribed by ANSI N18.1-1971. However, during the time the inspection was conducted and until the contract technician was fully qualified to ANSI N18.1 criteria, he was continuously paired on shift with an OPPD technician fully meeting ANSI N18.1-1971 criteria. The OPPD technician was a new employee who had undergone

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indoctrination training but was not considered adequately knowledgeable on plant systems and procedures to assume the sole responsibility of shift technician. Therefore, the assignment of these two technicians for this particular shift provided both sufficient experience in accordance with ANSI N18.1 and specific plant experience.

The following additional corrective measures have been taken to resolve this issue:

- a) The contract technician accumulated enough hours to meet the ANSI N18.1 experience requirement as of November, 1980.
- b) Indoctrination training of the new OPPD technician was completed on November 25, 1980.

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

The following steps will be taken to avoid further violations:

- a) Written selection criteria, in the form of position descriptions, exist for the classification of Chemistry-Radiation Protection personnel. These position descriptions will be upgraded to require the ANSI N18.1-1971 experience requirements to be met for Technician II and above. This will be accomplished by March 1, 1981.
- b) A system will be established to document health physics technician qualifications as specified in ANSI N18.1-1971. This program will include contract health physics personnel used for technician duties. This will be accomplished by March 1, 1981.

(3) Date when full compliance will be achieved.

The Omaha Public Power District is presently in full compliance.

Noncompliance

- B. 10 CFR 20 (f)(1) and (2). "containers" require that each container of licensed material bear a label showing the radiation caution symbol, the words, "Caution - Radioactive Materials" and information sufficient for workers to take precaution to avoid or minimize exposure.

Contrary to this requirement, at the time of the appraisal, several 55 gallon drums of waste materials, stored at 995'6" level of the auxiliary building, were not labeled or information provided as to their radioactive contents.

Response

(1) Corrective steps which have been taken and the results achieved.

The following corrective steps have been taken to resolve this violation:

- a) The subject drums were properly labeled in accordance with 10 CFR 20.203.
- b) A new plant procedure was developed and issued on November 11, 1980, entitled, "HP-8, Labeling of Radioactive Materials." This procedure ensures that radioactive/contaminated materials are properly controlled and labeled.
- c) The Radiation Protection Retraining program for employees holding a blue or red security badge has been revised to emphasize the need for proper radiation materials control. This training will be conducted as part of the Fort Calhoun Station annual employee retraining program.

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

In order to avoid further violations, procedure HP-8 will be complied with and retraining as noted above will be conducted.

(3) Date when full compliance will be achieved.

The Omaha Public Power District is presently in full compliance.

Noncompliance

- C. 10 CFR 20.409(b), "Notifications and Reports to Individuals," requires each licensee to report, in writing, to each individual who terminates his work assignment at the facility, the individual's record of exposure to radiation and radioactive material during his period of employment or work assignment.

Contrary to this requirement, two individuals who terminated employment on December 22, 1979, and August 15, 1979, were not sent a report of their exposure during their period of employment.

Response

(1) Corrective steps which have been taken and the results achieved.

The following steps have been taken to resolve this violation:

- a) Termination reports dated September 24, 1980, have been sent to the two individuals who terminated employment in December and August of 1979.

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- b) A new program has been implemented by the District by which notices of termination are forwarded to the Plant Health Physicist, by the OPPD employment department, for all OPPD employees terminating employment with the District. After these notices are received, termination reports are prepared and sent out as required. This program will assure that notification of termination is received by the plant radiation protection group. Contract personnel termination exposure reports are controlled by the monthly personnel dosimetry issuance procedure. Failure to receive replacement dosimetry devices initiates the termination report.
- c) All radiation protection personnel files for the years 1979 and 1980 were reviewed to ensure that termination reports were sent out as required. No other violations were discovered.

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

The measures stated above will assure that further violations do not occur.

(3) Date when full compliance will be achieved.

The Omaha Public Power District is presently in full compliance.

Sincerely,



W. C. Jones  
Division Manager  
Production Operations

WCJ/KJM/TLP:jmm

cc: LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

Subscribed and sworn to before me  
this      day of                      , 1981.

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Notary Public

