

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-285/82-24

Docket: 50-285

License: DPR-40

Licensee: Omaha Public Power District
1623 Harney Street
Omaha, Nebraska 68102

Facility Name: Fort Calhoun Station, Unit 1

Inspection at: Omaha Public Power District (Jones Street Offices),
Omaha, Nebraska

Inspection Conducted: October 18-22, 1982

Inspectors:

J. F. Jaudon
J. F. Jaudon, Reactor Inspector, Reactor Project
Section C (Paragraphs 1, 2, 3, 4, 5, and 8)

11/10/82
Date

M. E. Murphy
M. E. Murphy, Reactor Inspector, Reactor
Project Section C (Paragraphs 1, 6, 7, and 8)

11/10/82
Date

Approved:

W. D. Johnson
W. D. Johnson, Chief, Reactor Project Section C

11/10/82
Date

Inspection Summary

Inspection Conducted on October 18-22, 1982 (Report 50-285/82-24)

Areas Inspected: Routine, unannounced inspection of licensee action on previously identified items, design changes, organization and administration, offsite support, audit program and offsite committee. The inspection involved 64 inspector-hours by two NRC inspectors.

Results: Within the six areas inspected, there were no violations or deviations identified.

DETAILS

1. Persons Contacted

Omaha Public Power District

- *R. Andrews, Section Manager, Production Operations
- *G. Gates, Manager, Fort Calhoun Station
- J. Gloschen, Corporate Quality Assurance Engineer
- *R. Jaworski, Section Manager, Technical Services
- *W. Jones, Division Manager, Production Operations
- L. Kopecky, Records Coordinator, Generating Station Engineering
- B. Livingston, Manager, Administrative Services
- *K. Morris, Manager, Administrative Services
- *P. Surber, Section Manager, Generating Station Engineering
- *M. Winter, Manager, Quality Assurance

The NRC inspectors also contacted other plant and offsite personnel including administrative, clerical, engineering and quality assurance.

*Denotes presence at the exit interview conducted October 22, 1982.

2. Licensee Action On Previous Inspection Findings

(Open) Unresolved Item (8115-01). This item was unresolved because of the large backlog of design changes, many of which were duplications, as listed on licensee's bimonthly status report. The NRC inspector found that the licensee was still working on eliminating duplications in design changes. This task was assigned to an "update team," which is described in paragraph 3 of this report. The licensee's rate of progress appeared to be sufficient to meet the committed completion date for the update team review of December 31, 1983.

This item remains open.

(Open) Unresolved Item (8115-04). This item was unresolved because of the large backlog of drawings requiring update. The NRC inspector found that the licensee had increased the size of the drafting department as committed. At the time of the inspection, licensee records indicated that there was approximately a two week turnaround for drawings once the markups were forwarded to drafting. The review being conducted by the update team, discussed above and in Paragraph 3 of this report, appears to be the controlling factor in drawing update. Identification of the exact plant configuration resulting from design changes accomplished between 1975 and 1980 will not be completed until the end of 1983. The drawing backlog issue will not be resolved until this review is completed.

This item remains open.

(Closed) Open Item (8134-02). This item was open until there was a sufficient sample size available of the licensee's safety analysis reviews. The underlying issue was the adequacy of the licensee's records of the basis of the determination of whether or not a design change constituted an unreviewed safety question. The NRC inspector reviewed the safety analyses performed in conjunction with several recent design changes and found that they did record the basis as required by 10 CFR Part 50.59.

This item is closed.

(Closed) Open Item (8134-03). This item was open because there were insufficient records of design changes closed under the licensee's revised Procedure G-21 "Station Modification" to determine whether or not the licensee was following the provisions of Procedure G-21. The NRC inspector reviewed the records of seven closed design changes from 1981. From this review, it was concluded that the licensee was following his revised Procedure G-21 with regard to design change records.

This item is closed.

(Closed) Open Item (8134-04). This item was open because the licensee had not issued the draft Procedure G-47. The NRC inspector reviewed licensee Procedure G-47, "Control Room Drawings" (Revision 1, April 8, 1982). This procedure established a method to update control room copies of piping, instrument and electrical schematic drawings by interim issue after a design change was completed.

This item is closed.

3. Design Changes

The purpose of this inspection was to verify that design changes and modifications are accomplished in conformance with 10 CFR Part 50.59 and the Technical Specifications, Chapter 5.

The NRC inspector reviewed licensee Procedure G-21, "Station Modification Control" (Revision 14, May 4, 1982). Procedure G-21 had undergone a major change in September 1981. As a result, there were significant differences noted in the records of design changes initiated before and after September 1981. It was noted in the review of six records of design changes, which were initiated prior to 1981, that the licensee had made reasonable efforts to include information equivalent to that currently required by Procedure G-21 in the modification records. These six older design changes were closed in accordance with the new procedure. The NRC inspector also reviewed the records of seven design changes which had been initiated after September 1981. These more recent design change records appeared to meet all the requirements of Procedure G-21.

The NRC inspector had no questions concerning the review and approval of design changes based on the records reviewed. It was also noted that the requirements for testing modifications were being delineated clearly in current design changes.

NRC Inspection Report 50-285/81-15 had pointed out problems with the closing of design changes. The licensee was found to have established a six person update team to review all modifications through December 31, 1980. The update team was also reviewing maintenance orders, for it was determined that some maintenance orders completed several years ago had, in effect, been modifications. The update team is scheduled to complete their review by December 31, 1983. Licensee representatives expressed concern to the NRC inspector that this update team might not complete this task by the committed date. The NRC inspector found that the licensee had recently added a seventh member to the update team and planned to add an eighth member by November 1, 1982. Additionally, the NRC inspector was informed that the tasking priority for the update team was modifications affecting safety related systems, systems inside of containment, fire protection systems, and systems which contained radioactive fluids/gasses and then all other systems. It was noted that the details of the update team's methods included document review, system walkdown, drawing markup (for revision) and initiation of closeout forms. The NRC inspector expressed concern to licensee management that some older modifications (mid to late 1970s) might not have been adequately tested. The NRC inspector stated that, if such cases were found, he believed that either appropriate testing should be conducted or appropriate engineering evaluation of why testing was not required this late after the fact be included in the records. Licensee management stated that they shared the NRC inspector's concern in this area and that this item was being carefully considered as each of the older design changes was presented to the plant staff by the update team for closeout.

There were no violations or deviations identified in this area of the inspection

4. Organization and Administration

The purpose of this inspection was to determine whether or not the licensee onsite organization was in conformance with the Technical Specifications, Chapter 5. The NRC inspector noted no discrepancies between the organizational requirements of the Technical Specifications and the actual organization.

It was noted that the licensee had recently made several personnel changes in the onsite organization. There were no problems found regarding the experience or qualifications of the personnel newly appointed to site positions. The NRC inspector noted that, in addition to the operations supervisor, the plant manager, technical supervisor and maintenance supervisor, all held current operator licenses.

It was also noted that five shift technical advisors (STAs) had recently been replaced on shift. These five experienced STAs had all been retained on the plant staff to provide additional technical expertise in various departments.

There were no violations or deviations identified during this portion of the inspection.

5. Offsite Support Staff

The purpose of this inspection was to determine whether or not the offsite support staff functions are performed by qualified personnel.

The NRC inspector noted that the size of the offsite support staff had increased significantly between May 1981 and the time of this inspection. The following figures illustrate this increase.

Department/Group	May 1981	October 1982
Generating Station Engineering	49	83
(Engineers)	(30)	(45)
(Designers/Draftsmen)	(12)	(28)
(Clerical)	(7)	(10)
Licensing	2	3
Technical Services	50	54
Quality Assurance	9	14

During interviews with various members of the offsite staff, the NRC inspector did not identify any questions concerning the qualifications of the personnel interviewed. The NRC inspector noted that the training program for the offsite staff appeared to be minimal. During the interviews, however, it became apparent that individual managers had conducted training beyond these minimum requirements.

There were no violations or deviations identified in this area of the inspection.

6. Audit Program

This inspection reviewed that portion of the licensee's Quality Assurance Program relating to audits of activities to assure conformance with regulatory requirements, commitments, and industry guides or standards.

The NRC inspector reviewed the licensee's Quality Assurance Audit Program and determined that the scope has been defined and the program is consistent with FSAR commitments and Technical Specification requirements.

The following quality assurance procedures were reviewed to verify that: responsibilities have been assigned in writing for the overall management of the audit program including; adequacy of qualifications and training of audit personnel; corrective actions are taken for identified deficiencies; audit reports are issued to management; status and adequacy of the audit program is regularly reviewed; and long-range audit plans/schedules are prepared:

QAP #2	Audit Plans	Revision 2, May 1, 1981
QAP #7	Storage and Retention of QA Records	Revision 2, October 30, 1981
QAP #15	Adverse Condition Reporting and Correction	Revision 2, May 1, 1981
QAP #16	Internal Audit Cycle for QA Program	Revision 3, May 1, 1981
QAP #17	Audit Planning, Performance and Reporting	Revision 1, December 1, 1980
QAP #18	Auditor Training and Qualification	Revision 1, December 18, 1981
QAP #23	Fire Protection	Revision 0, January 25, 1980

The NRC inspector reviewed audit reports for 1980, 1981, and 1982 in the areas of adverse condition reporting and correction, nonconformity control, fire protection, handling and storage of QA records, and training. A concern in the areas of records was discussed with a representative of the licensee. This was the apparent lack of uniformity with which records are being handled, stored, and protected from the point of origin to consignment to QA for storage in the vault. A licensee representative described the licensee's records management system that is presently under development and expressed confidence that this system should resolve all problems with records.

There were no violations or deviations found in this area of inspection.

7. Safety Audit and Review Committee (SARC)

The NRC inspector reviewed the Committee Charter, Revision 5, July 28, 1981. The following Committee Procedures were also reviewed: No. 1, Safety Audit and Review Committee Records, Revision 3, July 28, 1981; No. 2, Safety Audit and Review Committee Reviews, Revision 4, January 22, 1982; No. 3, Safety Audit and Review Committee Auditing, Revision 6, January 22, 1982; and the meeting minutes for February 26, 1981, May 28, 1981, September 17, 1981, January 21, 1982, May 20, 1982, and September 30, 1982.

The document review by the NRC inspector determined that: membership qualifications are consistent with Technical Specifications and regulations; meeting frequency was in accordance with requirements; a quorum was present and consisted of the necessary expertise in the areas reviewed; the SARC conducted reviews in accordance with 10 CFR 50.59;

they reviewed Technical Specification and operating license changes, notification, reports and meeting minutes of the Onsite Review Committee; and use of consultants was in accordance with Technical Specifications.

There were no violations or deviations found in this area of inspection.

8. Exit Interview

An exit interview was conducted October 22, 1982, with those Omaha Public Power District personnel denoted in paragraph 1 of this report. At this meeting, the scope of the inspection and the findings were summarized.