DN-50-285/ P1-11

Omaha Public Power District

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

July 2, 1981 FC-416-81

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

Reference: Docket No. 50-285

Dear Mr. Seyfrit:

IE Inspection Report 31-11 dated June 2, 1981, identified two violations regarding the Fort Calhoun Station's procedures regarding control of stores items. Omaha Public Power District's response to those violations is attached.

Sincerely,

W. C. Jones Division Manager

Production Operations

WCJ/KJM/TLP:jmm

Attachment

cc: U. S. Nuclear Regulatory Commiss' n Office of Inspection and Enforcement Washington, D.C. 20555

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

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

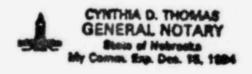
AFFIDAVIT

Manager - Production Operations of Omaha Public Power District; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to the Notice of Violation identified in NRC Inspection Report 81-11; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

W. C. Jones Division Manager Production Operations

STATE OF NEBRASKA)
) ss
COUNTY OF DOUGLAS)

Subscribed and sworn to before me, a Notary Public in and for the State of Nebraska on this 6000 day of July, 1981.



Cynthia O Thomas

District's Response to IE Inspection Report 81-11

Violation

A. Failure to Follow Storage Procedures

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

Lice see Standing Order G-22, Revision 3, "Storage of Critical Elements and Radioactive Material Packaging, Fire Protection Material, and Calibration Equipment," dated January 7, 1980, Section 3.10 requires that limited shelf life materials be controlled by a documented monthly inspection, and that critical elements stored in the licensee storage areas be identified with a "QA Material Conformance" tag upon acceptance.

Contrary to the above, the NRC inspector determined:

- 1. On May 6, 1981, three licensee purchase orders of silicone foam, for which the manufacturer states shelf life as an attribute, and identified by the licensee for fire protection applications, were stored in the licensee store room, but did not have the required documented monthly inspection shelf life controls.
- 2. On May 5, 1981, twenty critical element items were stored in licensee storage areas for accepted critical elements, but were not identified with the "QA Material Conformance" tag.

This is a Severity Level V violation (Supplement I.E.) 8 11-01

Response

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

Item 1: Standing Order G-22 requires inspection of all shelf life items. In the case of the silicone foam, there was no information available to stores personnel to indicate that the material had a shelf life. The material has been added to the OPPD Shelf Life and Proper Storage Review list.

Item 2: The twenty critical quality elements identified as having missing tags have been properly tagged with the "QA Material Conformance" tag.

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

Item 1: The District will develop a procedure and incorporate it into the purchasing manual to require the vendor of critical quality elements to state shelf life time and recommended inspections. When a shelf life item is received, it will be added to the OPPD Shelf Life & Proper Storage Review List.

Item 2: A training session will be held to ensure <u>all</u> stores personnel are aware of the importance of the Critical Quality Element storage program. Training will be documented and filed with training records.

3. Date when full compliance will be achieved.

Item 1: The District will be in full compliance by August 15,
1981.

Item 2: The District will be in full compliance by August 15,
1981.

Violation

B. Failure to Have Documented Procedures

10 CFR Part 50, Appendix B, Criterion v requires that activities affecting quality shall be prescribed by documented instructions and procedures.

The licensee's Quality Assurance Program for Operations, FSAR Section 17.5, "Instructions, Procedures and Drawings," states that licensee quality related activities are to be prescribed by documented instructions and procedures.

Contrary to the above, on May 7, 1981, licensee activities relating to the following areas affecting quality were not prescribed in documents instructions or procedures:

- Acceptability, identification and control, including single formula.
 Iife controls, of spare parts and components for safety-related applications remaining from initial construction spares.
- The administration, control and assigned responsibilities for licensee "Traveling Requisitions" for stores items used for safety-related applications.

This is a Severity Level VI violation (Supplement I.F.) 8111-02.

Response

Corrective steps which have been taken and the results achieved.

Item 1: Steps have been taken to inspect all items remaining from initial construction spares. Those items found acceptable will be placed in CQE storage and those not acceptable will be discarded. Those items with shelf life restrictions will be placed on the OPPD Shelf Life Control & Proper Storage Review List.

Item 2: Material management will revise the "Traveling Requisition" procedure and will change the Purchasing Manual to include the same requirements for Traveling Requisitions as for Purchase Orders and Normal Requisitions.

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

Item 1: Once the initial construction spares are inspected, no further inspection will be required.

Item 2: The Purchasing Manual will be updated, as discussed above.

3. Date when full compliance will be achieved.

Item 1: The District will be in full compliance by August 15,
1981.

Item 2: The District will be in full compliance by August 15, 1981.