

*Certified Original  
by N. Holbrook*

Appendix A

NOTICE OF VIOLATION

Omaha Public Power District  
Fort Calhoun Station

Docket: 50-285  
License: DPR-40

Based on the results of an NRC inspection conducted during the period July 6-10, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

A. Failure to Meet Record Retention Requirements

10 CFR Part 50, Appendix B, Criterion XVII states that records shall be identifiable and retrievable and that, consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention such as duration, location, and assigned responsibility.

The licensee Quality Assurance Manual, Section 1.2 states that the Omaha Public Power District commits itself to and complies with . . . the mandatory Quality Assurance program guidelines contained in . . . WASH-1284, "Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants." WASH-1284 in Section B invokes N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants." ANSI N45.2.9-1974 requires temporary and permanent record storage facilities that shall protect records from deterioration or destruction by fire and sets forth guidelines, including the optional retention of duplicate records in separate, remote storage facilities. ANSI N45.2.9-1974 further requires that records shall be accurately retrievable without undue delay, and in Appendix A delineates categories of required records for design, procurement, manufacturing, installation-construction, preoperational, startup test phase, and operation phase.

Contrary to the above, the NRC inspector determined:

1. On July 7 and 8, 1981, that licensee personnel could not retrieve certain licensee records, specifically, Monthly Technical Specification Calculation Sheets (Forms FC-261) for 1973, Quarterly Technical Specification Calculation Sheets (Forms FC-263) for 1973, 1974, and 1978, and monthly film badge or TLD data processing status prior to December 1973.
2. On July 7, 1981, that the licensee's Quality Assurance records vault did not meet the design requirements of ANSI N45.2.9-1974, Section 5.6, in that the roof was not concrete, the door was not fire rated, and one wall was penetrated by an air conditioner.

3. On July 7 and 8, 1981, that licensee "Fuel Inventory Reports" and "Records of Transient or Operational Cycling for Those Plant Components That Have Been Designated to Operate Safely for a Limited Number of Cycles" (Plant Usage Data Book), which are single permanent records, were not stored in the Quality Assurance records vault, or in a 2-hour rated file; but were permanently stored in a standard file cabinet in the corporate Quality Assurance office and on a desk top in the control center, respectively. These records are designated as permanent records to be stored in the Quality Assurance records vault by licensee Quality Assurance Procedure No. 7 (QAP No. 7), Revision 1, approved August 9, 1978, "Storage and Retention of QA Records."
4. On July 9, 1981, that the licensee record retention program defined in Quality Assurance Procedure No. 7 (QAP No. 7), Revision 1, approved August 9, 1978, "Storage and Retention of QA Records," was found to cover only operations phase records. In addition, the licensee was unable to retrieve installation-construction records relating to Reactor Coolant Safety Valve Response Test Procedures.
5. On July 7, 1981, that radiographic film (for which no duplicate records exist) was stored in the licensee Quality Assurance records vault in wooden containers in lieu of 2-hour fire rated file containers.
6. On July 8, 1981, that Fort Calhoun Station, Unit No. 1 Standing Orders C-2, Revision 6, dated September 30, 1980, "Fort Calhoun Quality Assurance (QA) Records," and C-3, Revision 6, dated March 2, 1978, "Fort Calhoun Station Quality Assurance (QA) Records (Chemistry and Radiation Protection ONLY)," do not require temporary record storage facilities to provide protection from destruction or deterioration as specified in ANSI N45.2.9-1974.
7. On July 7, 8, and 9, 1981, that the licensee was not microfilming all records, and that internal audit reports stated microfilming had stopped in mid-1980 even though the licensee had stated to the NRC by letter dated May 24, 1977, as modified by letter of October 10, 1977, that records would be microfilmed and that he would achieve full compliance for records storage by January 1, 1978.

This is a Severity Level V violation. (Supplement I.E.) (8116-01)

B. Failure to Retain Records Required by Technical Specifications

Licensee Technical Specification 5.10.2 requires that "records of radiation exposure for all individuals entering radiation control areas" and "records of gaseous and liquid radioactive material released to the environs" shall be retained for the duration of the Facility Operating License.

Contrary to the above, on July 7, 1981, the licensee could not retrieve the following licensee records of individual's radiation exposure and gaseous radioactive material released to the environs:

1. Pencil Dosimeter Log (Form FC-229) for 1973
2. Film Badge/TLD Reports prior to December 1973
3. Waste Gas Releases (Form FC-252) for 1974

This is a Severity Level V violation. (Supplement I.E.) (8116-02)

Pursuant to the provisions of 10 CFR Part 2.201, Omaha Public Power District is hereby required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

The responses directed by this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Dated: 8-5-81



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W. C. Seidle, Chief  
Engineering Inspection Branch