

## Omaha Public Power District

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

June 26, 1981

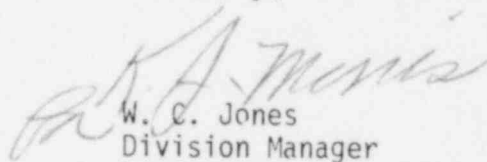
Mr. K. V. Seyfrit, Director  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Seyfrit:

IE Inspection Report 81-08 identified two violations related to the Fort Calhoun Station's Site Security Plan. 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 Commission  
Office of Inspection and Enforcement  
Washington, D.C. 20555

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

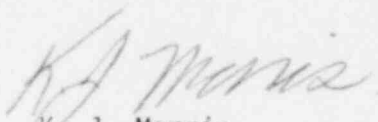
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
Omaha Public Power District ) Docket No. 50-285  
(Fort Calhoun Station, )  
Unit No. 1) )

AFFIDAVIT

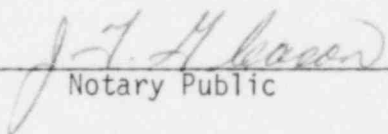
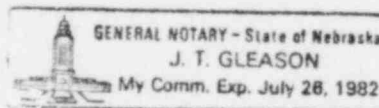
. . . . . being duly sworn, hereby deposes and says that he is Manager - Administrative Services of Omaha Public Power District; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to the Notice of Violation identified in NRC Inspection Report 81-08; 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.



K. J. Morris  
Manager - Administrative Services

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 26th day of June, 1981.

  
\_\_\_\_\_  
Notary Public

Attachment

RESPONSE TO IE INSPECTION REPORT 81-08

Violation

1. 10 CFR 50 Appendix B, I, states, in part, "The applicant shall be responsible for the establishment and execution of the quality assurance program. The applicant may delegate to others such as contractors, agents, or consultants, the work of establishing and executing the quality assurance program, or any part thereof, but shall retain responsibility therefor. . . ."

Fort Calhoun's Site Security Plan, in Section 1.3.1.1 states, in part, "All applicants selected for employment at Fort Calhoun Station must meet the following requirements: (4) must not have a record of felony conviction."

Section 1.6(3) of the Fort Calhoun Security Plan commits, in part, ". . . All non-District personnel are screened in accordance with ANSI 18.17-1973 or equivalent. (Three years of dependable employment with one firm is deemed to be equivalent to ANSI 18.17). Verification of such screening is provided by a letter signed by a responsible officer of the non-District individual's employer. These verifications may be periodically audited by the District. . . ."

Contrary to the above, Mr. John E. Neuman was employed at Fort Calhoun. Mr. Neuman did, in fact, have a felony conviction in his background. A letter from Combustion Engineering, verifying three years of dependable employment was provided to Fort Calhoun. This verification letter, however, does not relieve Fort Calhoun of the responsibility of ensuring that Section 1.3.1.1 of their Security Plan is met.

This is a Severity Level IV.3 violation.

Response

The Fort Calhoun Station Site Security Plan was issued as Amendment No. 42 to Facility Operating License DPR-40 on November 30, 1978, and to be effective on February 23, 1979. This plan was implemented in full on February 23, 1979. Section 1.3 of the Security Plan details the pre-employment screening process used for all District hired personnel at the Fort Calhoun Station. Section 1.3 applies only to District hired personnel and should not be confused with or applied to the screening process for Vendor/Contractor hired personnel. Section 1.6 describes the process by which non-District personnel are screened. The Fort Calhoun Station Site Security Plan requires that vendors/contractors screen personnel in accordance with ANSI 18.17-1973 or equivalent and then provide a letter signed by a responsible officer verifying that the screening had been accomplished. The vendor/contractor records may be periodically reviewed by the District if it becomes necessary. In the case referred to in the inspection report, a letter was provided by the contractor to the District verifying that the screening process was done, the letter was signed by a responsible officer and the results could have been audited by the District if the District deemed necessary. All procedures as stated in the Site Security Plan were followed and none were violated. Consequently, the District believes there has been no violation.

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

Mr. John Neuman's security badge has been pulled and he is no longer allowed access to the protected perimeter.

- (2) Corrective steps which will be taken.

None required.

- (3) The date when full compliance will be achieved.

The District is presently in full compliance.

#### Violation

2. 10 CFR 50.34(c) states, in part, ". . . each application for a license to operate a production or utilization facility shall include a physical security plan . . ."

10 CFR 73.55 states, in part, ". . . The licensee shall implement his plan and comply with all of the provisions of this section as soon as practicable after NRR approval of his plan but no later than February 23, 1979 . . ."

Fort Calhoun Site Security Plan, Section 1.3.1.2(8) states, in part, ". . . Successful completion of the physical examination is required before the applicant is placed on the payroll."

"In addition, applicants who require unescorted access to Fort Calhoun Station, receive a psychological evaluation by a licensed psychologist or physician for the purpose of determining indications of emotional instability . . ."

Section 1.3.1.2(8) also commits, in part, that, "After completion of the processing, the Department Head that has requested the processing of the applicant is notified of all the results. If the applicant is then acceptable for employment, he is hired for a six month probationary period . . ." This same Section later commits, in part, that, "The applicants birth certificate and a copy of his DD-214, if he is a veteran, are copied during the processing for district files . . ."

Section 1.4.1 of the plan states, in part, "The following are minimum qualifications that an applicant must meet before he is considered for employment in the security force organization. (1)(b) minimum education is high school diploma or equivalent."

Contrary to the above, while reviewing the security personnel files, the inspectors discovered some files were missing documentation that in fact a physical examination had been performed before the applicant began employment. One guard in particular, currently facing homicide charges and in a suspended status with

OPPD, did not receive a psychological examination prior to employment. The inspectors also noted that birth certificates were missing for six guards, high school diplomas were missing for eight guards and two guards had not produced DD-214's.

This is a Severity Level IV.3 violation.

Response

The corporate files for all security personnel were reviewed to confirm that physical examinations had been performed prior to security applicants starting employment. All security personnel had physical examinations administered prior to employment; copies of each physical examination were located in the appropriate corporate security file. Therefore, the District believes there was no violation regarding lack of physical examinations for security personnel.

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

To resolve the concern of new security personnel not receiving psychological examinations, correspondence was sent to Dr. Donald R. Jackson of the Physicians Clinic on March 10, 1981, requesting psychological examinations be added to the security physical examination. Dr. Jackson agreed to the District's request, and the psychological examinations were put in effect on March 18, 1981. A copy of Dr. Jackson's signed agreement was given to the Inspection Committee when they were on-site at Omaha Public Power District.

All security personnel files were also reviewed to determine missing documentation (birth certificates, high school diplomas, and DD-214's). All missing documents have been obtained and were properly placed in the appropriate corporate personnel files effective June 15, 1981. Effective May 1, 1981, the District now requires these documents be received before the security personnel can commence employment. This should preclude recurrence of this problem.

- (2) Corrective steps which will be taken.

None required.

- (3) The date when full compliance will be achieved.

The District is presently in full compliance.