



Omaha Public Power District

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

September 4, 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
Inspection Report 81-16

Dear Mr. Seyfrit:

The referenced inspection report identified two violations related to storage and control of Quality Assurance (QA) documents at the Fort Calhoun Station. Omaha Public Power District's response to the two violations is attached.

Sincerely,

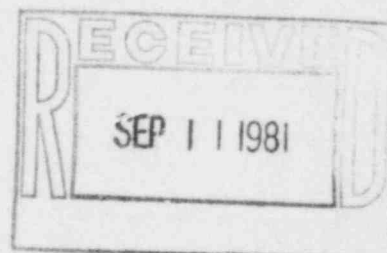
W. C. Jones
Division Manager
Production Operations

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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DISTRICT RESPONSE TO
IE INSPECTION REPORT 81-16

Violation

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)

District's Response

Finding 1

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

Over the last year, the District has been developing a Corporate Records Management System (RMS) that will provide a permanent fix to the problem of record retrievability. The TERA Corporation, who also installed the Commission's system, is developing and will install the District's RMS. The District is presently adding staff to support implementation of this system. Our present goal is to have the RMS operational by January 1, 1982; that is, we would be ready to start logging Fort Calhoun Station (F.C.S.) records into the system. We have designated the F.C.S. records to be of highest priority for incorporation into the RMS. As part of this effort, a detailed review of all F.C.S. records required for retention would be developed to ensure inclusion in the RMS. Upon complete implementation, all required F.C.S. records will be on microfilm and easily retrievable.

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

See 1. above.

3

3. Date when full compliance will be achieved.

Full compliance will be achieved when all F.C.S. records are entered into the RMS. The schedule to achieve this is presently being evaluated and will be provided to the Commission by October 15, 1981.

Finding 2

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

The upgrade of the QA vault has been a long outstanding modification request. The District has revised the priority of this modification to ensure timely resolution of the noted deficiencies.

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

The QA vault will be modified to meet the design requirements of ANSI N45.2.9. It should be noted that ANSI N45.2.9-1974 has been superseded by ANSI N45.2.9-1979 and the District is evaluating using the newer standard. Our initial evaluation of the 1974 standard indicates that a totally new vault may be required; whereas, the 1979 criteria would be less stringent.

3. Date when full compliance will be achieved.

The District expects to be in full compliance by February 28, 1982, using ANSI N45.2.9-1979 criteria. If ANSI N45.2.9-1974 criteria is required, the QA vault upgrade could not be completed prior to January 1, 1983.

Finding 3

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

The District is presently reviewing QAP-7 and Standing Order C-2 to determine needed revisions to reflect actual storage of records. The "Fuel Inventory Reports" are maintained by keeping duplicate records at separate locations; one copy for each report is maintained at the corporate QA offices and one copy by the Reactor Engineer, and QAP-7 will be revised to reflect this. The "Plant Usage Data Book" is a working record and must be readily accessible by the plant operators. Therefore, the District will revise QAP-7 and Standing Order C-2 to indicate that the "Plant Usage Data Book" will be maintained in the Control Room.

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

See 1. above.

3. Date when full compliance will be achieved.

The District will be in full compliance by November 1, 1981.

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

See 1. above.

3. Date when full compliance will be achieved.

The District will be in full compliance by November 1, 1981.

Finding 4

District Comment

The District does not agree that only operational phase records are covered by Quality Assurance Procedure No. 7 (QAP No. 7). It was prepared to assure compliance with ANSI N45.2.9-1974, "Requirements for Quality Assurance Records for Nuclear Power Plants," and applies to records of installation-construction as well as operations phase, as specified in Section 1.2, "Application."

The inspector was apparently concerned that Appendix A to QAP No. 7 addresses only the operations phase records. Appendix A, "Tabulation of Record Types," does address only operations phase records, as the District believes it should. QAP No. 7 provides procedures to be followed in today's environment, which is the operations phase. All records presently being generated at F.C.S. are operations related and Appendix A provides a list of all appropriate record types. QAP No. 7 provides guidance for District personnel to identify records that must be handled as QA records. Accordingly, this procedure is oriented towards the operations phase because these are the records being generated. QAP No. 7 as presently written meets the criteria of ANSI N45.2.9-1974. Therefore, the District believes QAP No. 7 provides assurance that all records will be properly maintained.

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

With regard to the inability to retrieve installation-construction records relating to Reactor Coolant Safety Valve Response Test Procedure, please refer to the Finding 1 response.

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

See response to Finding 1. The incorporation of these records into the RMS will ensure retrievability.

3. Date when full compliance will be achieved.

See response to Finding 1 and comment above.

Finding 5

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

The District is upgrading the QA vault as detailed in the District's response to Finding 2.

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

The QA vault will be upgraded to meet ANSI N45.2.9 criteria and the wooden storage boxes will be removed from the QA vault.

3. Date when full compliance will be achieved.

The District will be in full compliance when the QA vault upgrade is completed, as detailed in our response to Finding 2.

Finding 6

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

Standing Orders C-2 and C-3 are being revised to require that temporary record storage facilities provide protection from destruction or deterioration as specified in ANSI N45.2.9-1974. Additionally, the District is evaluating storage facility/equipment needs to ensure the availability of adequate qualified temporary storage space. It should be noted that the implementation of the RMS will significantly reduce the volume of temporary records.

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

Additional qualified storage space will be obtained as needed.

3. Date when full compliance will be achieved.

The District will be in full compliance by January 1, 1982.

Finding 7

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

The RMS presently being developed will include microfilming of all plant records. This system will be implemented as detailed in the District's response to Finding 1.

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

See 1. above.

3. Date when full compliance will be achieved.

See response to Finding 1.

Violation

- 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 materials 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.) (3116-02)

District's Response

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

The plant staff conducted a detailed search of plant locations for the missing records. The missing Pencil Dosimeter Log and Waste Gas Release forms were located and filed. We believe the Film Badge/TLD Reports may be permanently lost and a memorandum will be added to the file records to reflect this status.

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

The implementation of the RMS will prevent similar problems in the future.

3. Date when full compliance will be achieved.

The District will be in full compliance upon full implementation of the RMS, as discussed in our response to Finding 1.