

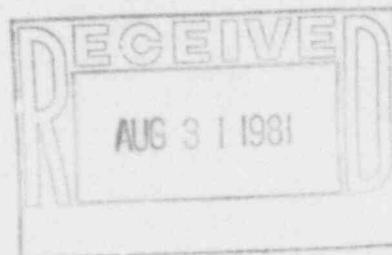


Omaha Public Power District

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

August 27, 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
IE Inspection Report 81-15

Dear Mr. Seyfrit:

On August 17, 1981, Messrs. John T. Collins, John P. Jaudon, James E. Gagliardo, and Dennis L. Kelley held a meeting with management personnel from the Omaha Public Power District to discuss specific concerns regarding the level of the District's support for the Fort Calhoun Station activities relating to design changes. During the meeting, Mr. Collins also expressed concern regarding the level of performance in certain other areas and provided some specific examples as being indications of potential problems.

One of the major items discussed during this meeting was the apparent lack of attention directed toward maintaining up-to-date drawings and other documents associated with plant modifications. This area was also referenced in IE Inspection Report 81-15. A response to that Inspection Report is attached and provides the District's complete response to concerns in this area.

Another example of the District's level of performance cited during the meeting concerned the records and documents control for the Fort Calhoun Station. The District's response to this concern will be addressed in our response to IE Inspection Report 81-16, scheduled to be submitted to your office by September 4, 1981. This response will include the resolutions and schedule for corrective actions and will define the responsibilities for the control of QA records within the District.

Another subject briefly discussed during this meeting was the deficiencies observed during the conduct of the District's annual emergency exercise, which was completed on July 22, 1981. Items of concern involved the monitor team's training, the length of time required to complete dose assessments, communications, and monitoring equipment performance. Corrective actions are being implemented in each of these areas to assure that the District's emergency response capabilities are properly maintained.

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Other areas of concern discussed during this meeting were in the health physics and plant security areas. Additional attention has been directed toward resolving deficiencies in these areas and will be fully addressed in the District's responses to the respective Inspection Reports.

Mr. Collins cited the above as examples indicating that the District's level of performance was not being maintained at the high standards which the District has typically maintained. We wish to emphasize that District management's goal has always been to provide the necessary support required to maintain the Fort Calhoun Station in a safe and efficient condition. As indicated by senior level management during this meeting, the Fort Calhoun Station staff does have the full support of senior level District management and the commitment to continue this support was reaffirmed during this meeting.

The District's management previously recognized that additional levels of support were required for the station. The recently completed District staffing studies were initiated several months ago and identified the need for additional staffing. Areas identified as requiring additional staff included security, operations, maintenance, technical, engineering, administrative, and training. A significant number of additional personnel is being added to the District's staff to assure that the high standards of performance for the Fort Calhoun Station are maintained. This action will provide the resources to further improve performance in these areas.

Sincerely,



W. C. Jones
Division Manager
Production Operations

WCJ/KJM:jmm

Attachment

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

DISTRICT'S RESPONSE TO UNRESOLVED ITEMS
IDENTIFIED IN IE INSPECTION REPORT 81-15

Unresolved Item 8115-01

"Licensee representatives stated that there was an effort in progress to identify and eliminate duplicate design changes, but did not commit to a completion date."

District's Response

The District has been actively reviewing all design documents to identify and eliminate duplicates. This effort will be completed by September 15, 1981.

Unresolved Item 8115-03

"The NRC inspector concluded from discrepancies noted in form FC-145 and from the fact that design change records were found which contained misfiled or extraneous information (e.g., correspondence on PORV testing filed with a feed pump design change) that the licensee had not established uniform or minimum standards for design change record packages."

District's Response

A procedure has been developed for closing out plant modification tasks. This procedure provides a list of which documents must be included in the completed design package before it can be closed out. This new procedure has been submitted to District management for approval for implementation. However, pending formal implementation, the procedure will be followed for all tasks to be closed out.

Unresolved Item 8115-04

"The NRC inspector noted that the licensee had a long history of problems with resource allocation to drawing revision (IE Inspection Report 76-03) and with timeliness of drawing revision (IE Inspection Report 79-08). The NRC inspector expressed his concern to licensee management that operators and other plant staff were faced with the potential of reacting to a casualty or emergency situation with incorrect drawings and that the unofficial (and uncontrolled) markup of drawings was widespread.

District's Response

Action has been taken to reorganize and apply resources more effectively in this area. The Generating Station Engineering Section has been authorized, since this inspection took place, to hire seven designer/draftsmen in 1981 and three in 1982. Ten designer/draftsmen will be assigned under a single supervisor which will allow more effective utilization of resources to update documents on current modifications. Additional clerical help has also been approved for 1981,

one of which will be a records clerk who will be assigned to the Fort Calhoun Station. The primary duties of the records clerk will be to expedite submittal of Modification Completion Reports and maintaining the station's updated drawing files.

In order to ensure that adequate attention is directed to the backlog of drawing updating which has developed, a new dedicated support group will be organized composed of six experienced District and consulting personnel. Action has already begun to identify individuals to be assigned to this group and their new duties will begin immediately following the 1981 refueling outage. The leader of this group will report directly to the Division Manager - Engineering and group members will have no other assigned duties which will conflict with the drawing updating effort. The support group will use a systematic approach to reduce the backlog. Their duties will be field checking, verification, and drawing mark-up. The actual drafting will be performed by the new drafting organization or by consultants as required due to manpower requirements.

As discussed during this meeting, a modification matrix has been completed and implemented. This matrix will greatly facilitate the control of the modification process. This matrix clearly defines the various responsibilities involved in modifications.

We plan to begin the mark-up and field verification of drawings immediately following the 1981 refueling outage, continue this effort through 1982, perform an inspection of the inaccessible areas of the plant during the 1982 refueling outage, and continue with the completion of the drawing update after the 1982 outage, with the goal being to eliminate the drawing backlog by December 31, 1983. We feel confident that by following this plan and allocating the above resources to such a dedicated effort, this goal can be achieved.

As an interim measure, a plant procedure will be implemented to control marked up P&ID and electrical drawings for operator use. This procedure will be implemented prior to restart of the Fort Calhoun Station following the 1981 refueling. This procedure will ensure that operators have an approved, updated set of drawings for reference and is intended for use until the normal drawing system is up-to-date.