Omaha Public Power District
1623 Harney Omaha, Nebraska 68102-2247
402/536-4000

May 7, 1990
LTC-90-0366

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Reference: 1. Docket No. 50-285
2. Letter from NRC (S. J. Collins) to OPPD (W. G. Gates) dated April 6, 1990

Gentlemen:

SUBJECT: Response to Notice of Violation and Notice of Deviation (NRC Inspection Report 50-285/90-02)

Omaha Public Power District (OPPD) received the subject inspection report (Reference 2) which identified one violation regarding raw water pump discharge check valves and one deviation regarding installation of cables. Attached please find OPPD's response to these items in accordance with 10 CFR Part 2.201.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/mc

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
A. Bournia, NRC Project Manager
R. D. Martin, NRC Regional Administrator, Region IV
P. H. Harrell, NRC Senior Resident Inspector

IE01
1/1

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION

During an NRC inspection conducted on January 16 through February 28, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violation is listed below:

Failure to Take Corrective Actions

Criterion XVI of Appendix B to 10 CFR Part 50 and Section A.17 of the licensee's approved QA Program, Updated Safety Analysis Report, require that measures be established to assure that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, the corrective measures initiated by the licensee failed to:

1. Identify in Safety Analysis for Operability 89-10 the potential for degradation of the raw water (RW) pump discharge check valves that could have resulted in the operation of the RW system outside of its design basis following the failure of the RW pump AC-10A discharge check valve (Valve RW-125) on June 24, 1989.

2. Provide for backflow testing of the RW pump discharge check valves to determine that further degradation had not occurred from the first quarter of January 1989 until January 1990.

This is a Severity Level IV violation. (Supplement I) (285/9002-04)

OPPD RESPONSE:

1. The Reason for Violation, if Admitted

OPPD admits to the failure to conduct RW pump discharge check valve surveillance testing (to monitor the condition of the remaining check valves) following issuance of Safety Analysis for Operability (SAO) 89-10.

The purpose of SAO 89-10 was to analyze the operability status of the raw water system with the internals removed from RW-125. SAO 89-10 was not issued to address potential further degradation of the raw water pump discharge check valves. When SAO 89-10 analysis was prepared, it conservatively accounted for the degraded condition of RW-117 based on backleakage data available at the time. As noted in the NRC Inspection Report, the SAO stated that if surveillance testing revealed further degradation of RW-117, then the condition should be assessed and the SAO revised accordingly.

Surveillance testing on these check valves, however, had been suspended prior to the failure of RW-125 and had not been resumed with the issuance of SAO-89-10. The apparent cause of this violation, therefore, was a lack of communication regarding surveillance testing of the RW pump discharge check valves.

2. The Corrective Steps That Have Been Taken and the Results Achieved

The four RW pump discharge check valves have been replaced and SAO 89-10 has been closed. Quarterly backleakage testing on these valves has been re-instated.

OPPD has reviewed the other SAOs which are in force to determine if there are other SAO-mandated surveillance requirements or compensatory measures which have been overlooked. This review revealed no similar situation with other SAOs.

3. The Corrective Steps Which Will be Taken to Avoid Further Violations

Based on the results of the review of other SAOs, OPPD considers the violation to be an isolated incident. However, OPPD intends to revise the procedure for preparation of SAOs (NOD-QP-22). In the event an SAO's requirements are more limiting than a surveillance test's acceptance criteria, the revision to NOD-QP-22 will require that a caution statement be added to the affected surveillance test(s) which precludes changing affected sections of the test procedure without review of the impact on the SAO conclusions. The caution statement would remain in the affected test(s) for the duration of the SAO. The revision to NOD-QP-22 will also clarify the need for the SAO to identify actions required to maintain the validity of the SAO. NOD-QP-22 will be revised by July 1, 1990.

4. The Date When Full Compliance will be Achieved

OPPD is presently in full compliance.

RESPONSE TO NOTICE OF DEVIATION

Based on the results of an . C inspection conducted January 16 through February 28, 1990, a deviation of your commitments made to the NRC was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the deviation is listed below:

Inadequate Installation of Cables

Figure 8.5-1, "Cable and Conduit Schedule Notes," of the Updated Safety Analysis Report states, in part, that the installation of electrical cables shall meet the following requirements:

- Paragraph 20.c states, in part, that the fill in trays for 125-Vdc and 120-Vac cables shall generally not exceed a maximum of 50 percent.
- Paragraph 22 states, in part, that prefixed (safety-related) cables may be routed in raceways containing nonprefixed (nonsafety-related) cables provided the cables are separated by a metallic barrier.
- Paragraph 18 states, in part, that control and instrument cables shall be tied down in a neat configuration after installation in trays.

In deviation from the above, the licensee failed to properly install cables in Trays 5-4A and 5-4B in that examples of improperly installed cables were identified by the inspector that did not meet the installation criteria identified above. (285/9002-03)

OPPD RESPONSE:

1. The Reason for the Deviation if Admitted

   OPPD admits the Deviation occurred as stated. The deviation occurred for two reasons:

   a. Inadequate instructions in the standard construction procedure to the Craftsmen and Quality Control Inspectors during the installation of cables, resulting in cables not being tied down.

   b. Inadequate procedures for the preparation of modification packages to address and analyze the impact of tray loading (percent fill) and safety and non-safety related cable separation using a metallic barrier. This resulted in tray overfills which render some of the existing metallic barriers ineffective.

2. The Corrective Steps Which Have Been Taken and the Results Achieved

   Available computerized data on cable tray fill has been reviewed against USAR criteria to identify potentially overfilled cable trays. An inspection has been initiated of readily accessible safety related tray subsections where fill in excess of the criteria has been identified.

3. The Corrective Action Steps Which Will be Taken to Avoid Further Deviations

OPPD plans to take the following actions to prevent recurrence of the deviation:

a. Prepare a Safety Analysis for Operability (SAO) to justify operation under the current configuration, and complete a walkdown of identified safety related tray sections (which are accessible without construction of scaffolding) to verify existing conditions are appropriately addressed by the SAO. This is to be completed before startup from the 1990 refueling outage (currently in progress).

b. Prepare an Engineering Analysis addressing the tray overfill and lack of a metallic barrier. This analysis will discuss updated criteria for determination of acceptable cable tray loading which will be incorporated into a future revision to the USAR. This Engineering Analysis is to be completed by June 15, 1990.

c. Update the OPPD Engineering Instruction dealing with cable separation and tray loading to require specific analysis for each modification which involves the installation or change in routing of cables in the Fort Calhoun Station. This is to be completed by August 24, 1990.

d. Update the construction procedure dealing with cable installation to provide better instructions to the craftsmen and Quality Control Inspectors on cable installation in the cable tray system. This will be completed by June 29, 1990.

4. The Date When Full Compliance Will be Achieved

OPPD expects to be in full compliance by August 24, 1990.