

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-285/90-28

Operating License: DPR-40

Docket: 50-285

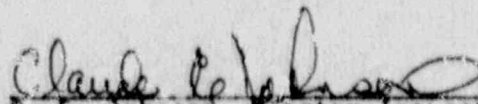
Licensee: Omaha Public Power District (OPPD)
Nuclear Operations
444 South 16th Street Mall
Omaha, Nebraska 68102-2247

Facility Name: Fort Calhoun Station (FCS)

Inspection At: FCS, Blair, Nebraska

Inspection Conducted: April 23-27, 1990

Inspector:


C. E. Johnson, Reactor Inspector, Plant
Systems Section, Division of Reactor Safety

5-3-90
Date

Approved:


T. F. Stetka, Chief, Plant Systems Section
Division of Reactor Safety

5/3/90
Date

Inspection Summary

Inspection Conducted April 23-27, 1990 (Report 50-285/90-28)

Areas Inspected: Routine, unannounced inspection of design change and modification program and controls.

Results: Within the area inspected, no violations or deviations were identified. Management attention in this area is evident. The design change and modification program has detailed procedures and flow charts on how design changes/modifications are implemented and controlled which is considered to be a strength.

DETAILS

1. Persons Contacted

OPPD

- *R. Andrews, Division Manager, Nuclear Services
- J. Chase, Manager, Nuclear Licensing
- *O. Clayton, Supervisor, Emergency Planning
- *S. Gambhir, Manager, Station Engineering
- *J. Gasper, Manager, Training
- *W. Gates, Division Manager, Nuclear Operations
- *R. Jaworski, Manager, Station Engineering
- D. Leibes, Security Supervisor
- *S. Lindquist, Licensing Engineer
- *D. Matthews, Supervisor, Station Licensing
- *T. Matthews, Station Licensing Engineer
- J. O'Conner, Supervisor, Electrical/I&C Design Engineer
- *G. Peterson, Plant Manager
- C. Simmons, Station Licensing Engineer
- *F. Smith, Supervisor, Chemistry
- *D. Spines, Quality Assurance (QA) Auditor
- *M. Tesar, Supervisor, Training
- D. Trausch, Supervisor, Operations
- *J. Uhlard, Supervisor, Technical Training

NRC

- *P. Harrell, Senior Resident Inspector
- *T. Reis, Resident Inspector
- *B. Spitzberg, Emergency Preparedness Analyst

*Denotes those that attended the exit interview.

The inspector also interviewed other licensee employees during the inspection.

2. Design, Design Changes, and Modification

The purpose of this inspection was to ascertain that design changes and modifications that are determined by the licensee to not require prior approval by the NRC are in conformance with the requirements of the Technical Specifications (TS), 10 CFR 50.59, Safety Analysis Report (SAR), and the licensee's Quality Assurance (QA) Plan.

2.1 Procedure/Program Review

The inspector reviewed several procedures pertaining to the design change package (DCP)/modification program. Standing Order (SO) procedure G-21 establishes the procedural steps and responsibilities for initiating,

reviewing, approving and cancelling a modification. 50 G-21 also governs the implementation, acceptance, and closeout requirements for a modification and defines the requirements applicable to field change documentation.

50 G-21 gives detailed instructions and provides flow charts on how modifications are controlled. Procedures reviewed by the inspector were adequate. Procedures reviewed are listed in the Attachment to this report.

2.2 Design Change Package (DCP) Review

The inspector selected six DCPs/modifications from various systems for documentation review and examination. The majority of the DCPs reviewed were still in progress. DCPs were reviewed by the inspector to determine if the following had occurred:

- ° DCPs were reviewed and approved by the Plant Review Committee (PRC);
- ° DCPs were controlled by approved procedures;
- ° 10 CFR 50.59 safety evaluations had been performed and contained sufficient detail to evaluate all unreviewed safety questions;
- ° Operator training programs were revised and necessary operator training was conducted prior to a modified system being declared operable;
- ° Control room drawing changes, required as the result of a modification, were made; and,
- ° Test records/procedures were reviewed and approved by the licensee prior to the modified system being declared operable.

The inspector noted one item of concern pertaining to the 10 CFR 50.59 annual reporting requirements. The licensee was submitting a monthly report that did not meet the requirements of the 10 CFR 50.59 regulation. Further investigation indicated that this item was previously identified in NRC Inspection Report 50-285/90-06. As the result of this inspection report finding, the licensee committed in letter LIC-90-0138, dated February 15, 1990, to provide the 10 CFR 50.59 reports on an annual basis with the first submittal being March 1, 1991.

The inspector conducted interviews and held discussions with licensee personnel directly involved in the preparation, tracking, evaluation, and approval of DCPs. Personnel interviewed were knowledgeable of the current program and of the procedures in place. The DCPs reviewed are listed in the Attachment.

2.3 Field Verification of DCPs/Modifications

The inspector, accompanied by a licensee representative, visually inspected several modified systems to verify the as-built field condition. This inspection verified that the installation conformed to the as-built drawings. No discrepancies were identified.

2.4 Temporary Modification

The inspector reviewed procedure SO G-25 pertaining to the control of temporary modifications (TM). This procedure applies to both safety-related and nonsafety-related systems. The implementation of TM program controls requires the following:

- Review and approval of the TM by the Plant Review Committee (PRC);
- Performance of a 10 CFR 50.59 safety evaluation;
- Maintenance of a formal record that provides the status of TMs;
- Independent verification; and,
- Use of detailed approved procedures when performing TMs.

Review of one TM by the inspector indicated that the requirements of Procedure SO G-25 were implemented properly. The TM and procedure reviewed are listed in the Attachment.

3. Conclusion

The inspector determined that adequate controls and procedures pertaining to the design change/modification program including temporary modifications have been established and are in accordance with regulatory requirements and the licensee's QA program.

4. Exit Interview

The inspector met with the licensee personnel (denoted in paragraph 1) on April 27, 1990, and summarized the scope and findings of this inspection as detailed in this report. No information was identified as proprietary.

ATTACHMENT

Modification Procedures

SO G-21, "Modification Control," Revision 39, March 16, 1990
GEI-3, "Preparation of Design Packages," Revision 3, January 31, 1990

Safety Evaluation Procedures

GEI-27, "10 CFR 50.59 Safety Evaluation," Revision 0, November 15, 1990
NOD-QP-3, "10 CFR 50.59 Safety Evaluations," Revision 7, February 15, 1990

Temporary Modification Procedure

SO G-21, "Temporary Modification Control," Revision 30, March 27, 1990

Document Control Procedures

GET-37, "Drawing Control Instruction for Design Change Packages," Revision 0, December 1988
GEI-38, "P&ID/EM Drawing Issuance Instruction," Revision 0, May 31, 1989
GEI-39, "Marking of As-Built Drawings Under Revision," Revision 1, September 8, 1989
SO-C-5, "Ft. Calhoun Station Print Files," Revision 11, October 17, 1989

Design Change Packages/Modification Package

- *FC 85-033, "Evaluation Replacement of Process/Area Radiation Monitors"
- FC 86-091, "Limitorque Motor Operator Update"
- FC 86-049, "Redistribute Loads/DC Busses and Inverter"
- *FC 89-025, "RCS Narrow Range Level Instrument"
- FC 89-068, "A1-179 Indications"
- *FC 89-051, "DG Fuel Transfer Pump Instrument PO-4A/4b-1 & FO-4A/4B"
- * Verified by field inspection.

Temporary Modification Package

88-E-061, "RC Surge Line"