

APPENDIX A
NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Nuclear Station

Docket: 50-285/82-03
License No. DPR-40

Based on the results of an NRC inspection conducted during the period of February 1-28, 1982, and in accordance with the Interim Enforcement Policy 45 FR 66754 (October 7, 1980), the following violation was identified:

Failure to Provide Adequate Instructions and Procedures

Technical Specification 5.8.1 requires that, "written procedures . . . be established, implemented, and maintained that meet or exceed the minimum requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972, and Appendix A of USNRC Regulatory Guide 1.33"

Section 5.1 of ANSI N18.7-1972 states that the licensee, "establish rules and instructions pertaining to personnel conduct and control . . . (and) method of conducting operations . . .," and that, "guidance should be provided to identify the manner in which procedures are to be implemented."

- a. Section 5.3.3 of ANSI N18.7-1972 requires that instructions be provided, "for energizing, filling, venting, draining, starting up, shutting down, changing modes of operation, and other instructions appropriate for operations of systems related to the safety of the plant"

Contrary to the above, the licensee's instructions and procedures failed to adequately address the circumstances of February 3, 1982, in that two separate system evolutions (sampling of the Volume Control Tank gas space and draining of the vent header) in combination allowed radioactive gas to enter a system vented to atmosphere, causing an unplanned off-site release.

- b. Section 8b of Appendix A of USNRC Regulatory Guide 1.33 states that, "specific procedures for surveillance tests, inspections, and calibrations should be written (implementing procedures are required for each surveillance test, inspection or calibration listed in the Technical Specifications)." Standing Order G-23 establishes the Surveillance Test Program which requires that, "safety-related equipment be tested on a periodic basis to verify its operational readiness to perform its design function."

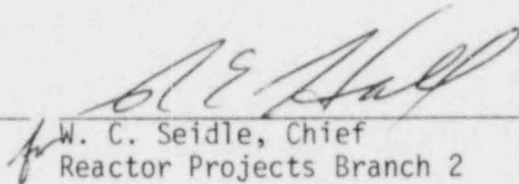
Contrary to the above, Surveillance Test ST-ISI-CC-1, Section F.3 failed to ensure that Relief Valve AC-341 was properly returned to service after a bench test of the relief set point on October 28, 1981,

in that the gag plug was missing, allowing radioactive waste gas to escape from the vent header in an unplanned release into the Auxiliary Building.

This is a Severity Level IV violation. (Supplement I.D.3) (8203-01)

Pursuant to the provisions of 10 CFR Part 2.201, Omaha Public Power District is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

Date March 18, 1982


W. C. Seidle, Chief
Reactor Projects Branch 2