

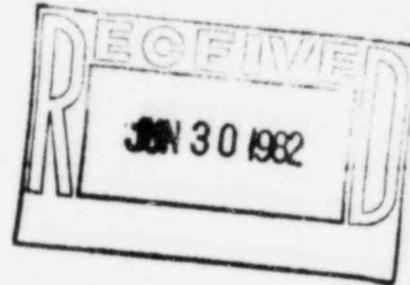


Omaha Public Power District

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

June 25, 1982
LIC-82-246

Mr. W. C. Seidle, Chief
Reactor Project Branch 2
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



Reference: Docket No. 50-285

Dear Mr. Seidle:

IE Inspection Report 82-06

The subject Inspection Report, dated May 27, 1982, identified one violation regarding the apparent failure to follow written procedures upon inserting a specific fuel rod into a fuel bundle at the Fort Calhoun Station. The Omaha Public Power District's response to the subject violation is attached.

Sincerely,

W. C. Jones
Division Manager
Production Operations

Attachment

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

8208240298Q

OMAHA PUBLIC POWER DISTRICT'S RESPONSE
TO IE INSPECTION REPORT 82-06

Violation

Failure to Follow 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"

Standing Order G-7 establishes the Operating Manual and stated in Section 1.3 that "adherence to (the) Operating Manual is mandatory."

Contrary to the above, on March 30, 1982, the licensee failed to insert Fuel Rod KJN024 into Fuel Bundle D013 in accordance with Section 5.3 of Special Procedure SP-SS-2, "Comprehensive Fuel Inspection Stand Operation," a portion of the Operating Manual.

Response

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

Upon discovery of this incident, the District immediately re-instructed all contractor personnel involved in the handling and inspection of the subject irradiated fuel rods on the criteria and precautions of Special Procedure SP-SS-2 and on the importance of procedural compliance. Additionally, District personnel were assigned to work directly with the contractor personnel performing the assembly, disassembly, and movement of the irradiated fuel during the inspections. Prior to the subject incident, District personnel had been monitoring the work being performed by the contractor and were not directly involved in the activities. Following the implementation of these corrective actions, no additional problems occurred during the remainder of the scheduled fuel handling and inspections.

The District also reviewed Special Procedure SP-SS-2 with the objective of determining whether the subject procedure provided adequate instruction and precaution. The District's review has determined that SP-SS-2 did indeed provide adequate instruction. However, further control of future work performed will be provided with the implementation of the items detailed below.

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

The District's contractor that performed this irradiated fuel inspection work has been contacted by the District and has been requested to provide documentation that identifies all personnel performing future work at the Fort Calhoun Station have been properly selected and trained in accordance with the requirements of the task. Until this documentation is received by the District,

- 2) Corrective steps which will be taken to avoid further violations.
(Continued)

these contractor personnel will not be allowed to conduct nuclear fuel movement and inspections at the Fort Calhoun Station.

The District will revise the applicable procedures, utilized for the movement, assembly, and disassembly of irradiated nuclear fuel assemblies during contractor performed fuel inspections, to require both District and contractor personnel signatures following performance of the subject work. These signatures will confirm that both the District and the contractor are satisfied that the fuel rods and/or assemblies have been properly handled in accordance with the procedures. This change will necessitate that the District concur with the contractor's actions, which was not previously formally required, and will ensure the District maintains an adequate level of observation of the inspection activities.

- 3) Date when full compliance will be achieved.

With the completion of the corrective actions in Item 1) above, the Omaha Public Power District is presently in full compliance. To further preclude future incidents, the District will complete the revision to the appropriate procedures prior to the next utilization of these procedures for irradiated fuel inspections, which is tentatively scheduled after the completion of the 1983 refueling outage in late March or April 1983.