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Docket No. 50-285

Mr. W. C. Jones
 Division Manager, Production
 Operations
 Omaha Public Power District
 1623 Harney Street
 Omaha, Nebraska 68102

Dear Mr. Jones:

SUBJECT: NUREG-0737, ITEM I.C.6

The NRC has completed its review of your submittals with regard to NUREG-0737 Item I.C.6 (Guidance on Procedures for Verifying Correct Performance of Operating Activities). Based on this review, we have determined that your procedures and planned implementation and actions related to the procedures and NRC requirements are acceptable. A copy of our evaluation is enclosed.

Based on the above, NUREG-0737 Item I.C.6 is considered resolved for the Fort Calhoun Station.

Sincerely,

Original signed by
 Robert A. Clark

Robert A. Clark, Chief
 Operating Reactors Branch #3
 Division of Licensing

Enclosure:
 As stated

cc: See next page

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DATE	8/27/82	8/27/82	8/27/82	8/30/82			

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Verify Correct Performance of Operating ActivitiesPosition

Item I.C.6 of the U.S. Nuclear Regulatory Commission Task Action Plan (NUREG-0660) and Recommendation 5 of NUREG-0585 propose requiring that licensee's procedures be reviewed and revised, as necessary, to assure that an effective system to verifying the correct performance of operating activities is provided. An acceptable program for verification of operating activities is described below.

The American Nuclear Society has prepared a draft revision to ANSI Standard N18.7-1972 (ANS 3.2) "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." A second proposed revision to Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," which is to be issued for public comment in the near future, will endorse the latest draft revision to ANS 3.2 subject to the following supplemental provisions:

- (1) Applicability of the guidance of Section 5.2.6 should be extended to cover surveillance testing in addition to maintenance.
- (2) In lieu of any designated senior reactor operator (SRO), the authority to release systems and equipment for maintenance or surveillance testing or return-to-service may be delegated to an on-shift SRO, provided provisions are made to ensure that the shift supervisor is kept fully informed of system status.
- (3) Except in cases of significant radiation exposure, a second qualified persons should verify correct implementation of equipment control measures such as tagging of equipment.
- (4) Equipment control procedures should include assurance that control room operators are informed of changes in equipment status and the effects of such changes.
- (5) For the return-to-service of equipment important to safety, a second qualified operator should verify proper systems alignment unless functional testing can be performed without compromising plant safety, and can prove that all equipment, valves, and switches involved in the activity are correctly aligned.

NOTE: A licensed operator possessing knowledge of the systems involved and the relationship of the systems to plant safety would be a "qualified" person. The staff is investigating the level of qualification necessary for other operators to perform these functions.

For plants that have or will have automatic system status monitoring as discussed in Task Action Plan item I.D.3, NUREG-0660, the extent of human verification of operations and maintenance activities will be reduced. However, the need for such verification will not be eliminated in all instances.

Discussions and Conclusion

The licensee requires: (1) the same criteria for equipment that is removed from service for surveillance as for equipment that is removed from service for maintenance; (2) procedures to assure that the shift supervisor is aware of system status whenever equipment is removed from service for maintenance or surveillance and also a shift supervisor's signature on releases of equipment for maintenance or surveillance; (3) operators to tag out equipment and verify that equipment has been tagged and is in the required positions; (4) the shift supervisor to have the responsibility for release of equipment for maintenance and/or surveillance and maintain a maintenance order index and a equipment tag out log and keep the control room operators up to date on status of equipment changes and effects of changes; and (5) safety-related systems to be independently verified after a refueling outage, but continuous service systems (examples: Raw Water and Component Cooling Water) are not checked.

The licensee does not have a specific requirement for a second qualified operator to verify system line-up, except as stated above. The auxiliary feedwater system line-up is verified by a second qualified operator each time surveillance or maintenance is performed on that system.

Based on this review, Region IV has determined that the licensee's procedures and planned implementation and actions related to the procedures and NRC requirements are acceptable.