

Omaha Public Power District
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March 18, 1994
LIC-93-0303

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

- References:
1. Docket No. 50-285
 2. NRC Memorandum (Biennial Reviews of Plant Procedures) from G. G. Zech to Regional Division Directors of Reactor Safety dated March 3, 1992
 3. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated December 11, 1992 (LIC-92-0321)
 4. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated May 11, 1993 (LIC-93-0110)
 5. Letter from NRC (S. J. Collins) to OPPD (T. L. Patterson) dated July 9, 1993
 6. Letter from (W. G. Gates) to NRC (Document Control Desk) dated July 28, 1993 (LIC-93-0193)

Gentlemen:

SUBJECT: Additional Information on the Fort Calhoun Station Quality Assurance Program for Procedure Reviews

In Reference 3, Omaha Public Power District (OPPD) proposed to revise the Fort Calhoun Station (FCS) Quality Assurance (QA) Program to take credit for the dynamic procedure review process and delete the requirement to perform biennial procedure reviews. In response to a telephone call from Mr. Les Constable of Region IV on December 20, 1992, OPPD supplemented Reference 3 with a commitment to perform a QA review on a representative sample of applicable plant procedures on a two year cycle, as stated in Reference 4. On July 9, 1993, Reference 5 was transmitted to OPPD stating that the NRC would require more than 60 days to complete their review. Mr. Ron Short of OPPD telephoned Mr. Constable on July 9, 1993 to discuss this issue. Mr. Constable requested an additional submittal, which was provided in Reference 6, to ascertain commitments to address additional topics covered in the relevant NRC internal memorandum (Reference 2).

Another telephone call was held on September 29, 1993 among Mr. H. Bundy (NRC Region IV), Mr. S. Bloom (NRR), Mr. R. Latta (NRR) and OPPD personnel to discuss the content of Reference 6. During this call, the NRC requested additional information to complete the review of OPPD's proposed alternatives to the NRC Guidance Criteria Nos. 2 and 4 contained in Reference 2. This information is provided below.

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NRC Guidance Criterion No. 2

Non-routine procedures (procedures such as emergency operating procedures (EOPs), off-normal procedures (AOPs), procedures which implement emergency plan (RERP/EPIP), and other procedures whose usage may be dictated by an event) shall be reviewed at least every two years and revised as appropriate.

OPPD Position

The NRC requested more information on the extent to which EOPs and AOPs are reviewed during the preparation and implementation of EOP and AOP operator training. Specifically, are balance of plant evolutions as well as control room evolutions reviewed, and, when issues are discovered, are they incorporated into procedure revisions?

In place of the current biennial review, OPPD proposes to take credit for the FCS dynamic procedure review process (Attachment A to Reference 3) and the extensive exercising of EOPs and AOPs in operator training. The Training Program Master Plan (TPMP) for Licensed Operator Requalification requires all EOPs and AOPs to be covered in requalification training at least once every two years. The Reactor Operator and Senior Reactor Operator TPMPs require all EOPs and AOPs to be covered for each training class of license candidates. Training on EOPs and AOPs includes classroom lectures, simulator sessions and plant walkdowns. Lesson Plans are the bases for classroom lectures, Simulator Scenario Guides are the bases for simulator training sessions, and Job Performance Measures (JPMs) are the bases for plant walkdowns. These training materials are reviewed prior to each use to ensure the information is consistent with the latest revision of each EOP and AOP. Nonlicensed operators perform plant walkdowns of EOPs and AOPs using Performance Evaluation Checklists (PECs), which are the nonlicensed operator equivalent to JPMs.

Procedural discrepancies noted during the preparation or implementation of training are provided back to the Operations staff for resolution, including initiation of procedure changes when necessary. Since requalification training is repeated for all operating crews and staff crews, the EOPs and AOPs undergo significant scrutiny. The EOPs and AOPs are also evaluated by NRC staff during NRC-administered operator licensing examinations and emergency preparedness exercises, and by INPO evaluators during INPO plant evaluations. OPPD is confident that the FCS dynamic procedure review process and the extensive exercising of EOPs and AOPs during operator training provide reasonable assurance that the procedures are continually maintained in optimal condition. Because there is little chance that a biennial review would discover a problem not revealed either by the FCS dynamic procedure review process or during the training process, expenditure of additional resources for a full-scope biennial review process is unwarranted.

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NRC Guidance Criterion No. 4

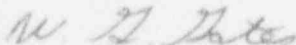
Routine plant procedures that have not been used for two years shall be reviewed before use to determine if changes are necessary or desirable.

OPPD Position

The NRC requested more detailed information regarding the handling of OPPD procedures to which Criterion No. 4 is applicable. In response, OPPD proposes that any routine plant procedure which has not been used or reviewed within two years be reviewed before use. This will provide flexibility in scheduling procedure reviews prior to outages.

As detailed above (and in References 4 and 6), the alternatives proposed by OPPD to the criteria in Reference 2 will provide more than adequate assurance that the quality of plant procedures is maintained. Please contact me if you have any questions.

Sincerely,



W. G. Gates
Vice President

WGG/tcm

- c: LeBoeuf, Lamb, Greene & MacRae
L. J. Callan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Project Manager