

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102-2247
402/536-4000

September 17, 1990
LIC-90-0745

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter from NRC (S. J. Collins) to OPPD (W. G. Gates) dated August 16, 1990
 3. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated September 12, 1990 (LIC-90-0740)

Gentlemen:

SUBJECT: Response to Notice of Violation - Inspection Report 50-285/90-32

Omaha Public Power District (OPPD) received the subject inspection report which identified one violation. The violation involved surveillance testing of emergency diesel generators (EDGs). Please find attached OPPD's response to the Notice of Violation in accordance with 10 CFR Part 2.201.

In Reference 2, the NRC expressed concern that this violation is a result of inadequate corrective actions in response to a non-cited violation (NCV) identified in late 1989 (50-285/89-32). OPPD took corrective action to the subject NCV by revising the EDG surveillance tests to include the requirement for the verification of EDG loads during a refueling outage. However, OPPD incorrectly interpreted the Technical Specification limit.

OPPD's current program for verification and review of corrective actions is adequate and provides several checks to ensure that they are appropriate and timely. A currently established Safety Audit and Review Committee semi-annual audit, assesses completed corrective actions on a random sample basis. No deficiencies have been identified in the past year in regards to corrective

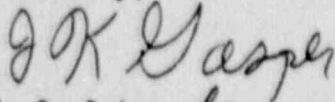
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actions taken in response to NRC violations. Inadequate corrective action taken for other findings are documented and properly addressed. Therefore, this incident appears to be an isolated case and OPPD's program is adequate for ensuring appropriate and timely corrective action.

If you should have any questions, please contact me.

Sincerely,



W. G. Gates *for*
Division Manager
Nuclear Operations

WGG/se1

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
A. Bournia, NRC Project Manager
R. D. Martin, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION

During an NRC inspection conducted June 17 through July 28 and August 1, 1990, a violation of NRC requirements was identified. The violation involved surveillance testing of emergency diesel generators (EDGs). In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990) (Enforcement Policy), the violation is listed below:

Failure to Adequately Perform a Surveillance Test

Technical Specification 3.7(i)c.iii states, "Tests shall be conducted during each refueling outage to demonstrate the satisfactory overall automatic operation of each diesel system. This test shall be conducted by verification that emergency loads do not exceed the 2000 hr-KW rating of the engine."

Contrary to the above, the licensee failed, during the 1990 refueling outage, to verify that emergency loads do not exceed the 2000 hr-KW rating of the EDG in that a load profile for emergency loads was not determined for the equipment when operating in an emergency condition.

This is a Severity Level IV violation. (Supplement 1)

OPPD RESPONSE:

1. The Reason for the Violation, if Admitted

OPPD admits to the violation as stated. The violation occurred as a result of an incorrect interpretation of the Technical Specification limit. OPPD interpreted the specification to mean a testing limit for the refueling outage automatic loading test.

2. The Corrective Steps That Have Been Taken and the Results Achieved

OPPD has completed both an outside air temperature based engine/generator model and an update to the diesel generator LOCA loads model calculation. An analysis (EA-FC-90-062) previously submitted for NRC information (Reference 3) demonstrates that the load profile for diesel generator DG-1 will be below the two thousand hour time/jacket water temperature based output derating curve for outside ambient air temperatures of 107°F and below. Similarly the DG-2 load profile will be below the two thousand hour engine output curve for outside ambient temperature of 103°F and below. Based on the above analyses/calculations, Fort Calhoun Station is considered in compliance with Technical Specification 3.7(i)c.iii which requires that autoconnected loads be within the 2000 hour rating of each diesel generator, for an engine which is auto loaded starting from its pre-warmed temperature.

3. The corrective Steps Which Will Be Taken to Avoid further Violations

- a. Enhancements will be made to OPPD's Fort Calhoun Station modification procedures and engineering instructions to provide more specific direction as to how to assess the impact of a new load on the diesel generator. These enhancements will be made by October 28, 1990.
- b. A surveillance test will be established with a refueling outage frequency to verify that the expected worst case load profile for the diesel generators as a result of a design basis accident (DBA) remains below the 2000 hour diesel generator output limit based on ambient outside air temperature and jacket water outlet temperature. This will be in place by March 15, 1991. The next scheduled Fort Calhoun Station Refueling Outage will be conducted in the Fall of 1991.

4. The Date When Full Compliance Will Be Achieved

OPPD will achieve full compliance by March 15, 1991.