



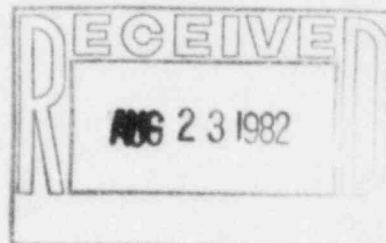
Omaha Public Power District

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August 18, 1982

LIC-82-277

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
IE Inspection Report 81-37

Dear Mr. Seidle:

Systematic Assessment of Licensee
Performance (SALP) Board Recommendations
for the Fort Calhoun Station

The referenced report, dated June 25, 1982, detailed the results of the SALP Board's evaluation of the Fort Calhoun Station for the period July 1, 1980 through June 30, 1981. The SALP Board assessed and rated Omaha Public Power District's performance at the Fort Calhoun Station in fourteen (14) functional areas. The Board also identified recommendations for improving District performance in seven (7) of the fourteen (14) functional areas. The District believes that, as a result of corrective measures initiated in 1981 and early 1982, we have significantly improved our performance in the seven (7) functional areas. A summary detailing the measures taken and progress to date is attached. It is and has always been the District's goal to operate the Fort Calhoun Station safely and efficiently, and we believe that our timely response to the SALP Board recommendations demonstrates our commitment to this goal.

Sincerely,

W. C. Jones
Division Manager
Production Operations

WCJ/TLP:jmm

Attachment

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

Mr. Lawrence A. Yande?? - NRC
Senior Resident Inspector

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OMAHA PUBLIC POWER DISTRICT'S RESPONSE
TO THE SALP BOARD RECOMMENDATIONS

1) Plant Operations

Board Recommendations

The Board recommends that the licensee fully implement design changes in a timely manner. Additional effort should be directed towards the fire protection program responsibilities and management involvement in the jumper control program.

Response

The first recommendation was derived from the SALP Board's concern that "...the failure to implement design changes and effect timely completion of maintenance items has resulted in an excessive number of control room annunciators being illuminated." The District would like to emphasize that the illumination of various annunciators in the control room during the operating mode represents a normal design condition at the Fort Calhoun Station. However, the District recognized that reducing the total number of lighted annunciators would facilitate the effectiveness of the operations staff. Therefore, the District has initiated a program to evaluate specific annunciators with the goal of reducing the total number of lighted annunciators during normal operation. Results of this evaluation are expected to be complete in a few months and then identified repairs or modifications to eliminate unnecessary bypassed/off-normal annunciators will be initiated. Substantial manpower additions to the plant and corporate support staffs since the SALP evaluation have and will continue to allow the District to perform identified or required design/maintenance work within a reasonable time period.

Standing Order (S.O.) G-28, "Station Fire Protection Plan," addresses and ensures that fire protection program responsibilities are assigned and maintained by applicable personnel of the District. Division management involvement in the formulation, implementation, and assessment of the fire protection program ensures that an effective program with competent personnel is maintained. S.O. G-28 was revised in March, 1982 to include this management responsibility regarding the fire protection program.

Further efforts since the SALP evaluation have included initiation of quarterly fire brigade drills for each shift fire brigade and development of a lesson plan for initial fire brigade training with subsequent inclusion into the computerized training tracking system. The District believes the present level of training and management involvement provides sufficient program control and responsibility cognizance.

Standing Order O-25, "Electrical Jumpers Control," was revised in December, 1981 to require the Supervisor - Instrument and Control and Electrical Field Maintenance to review the jumper log, which identifies all installed jumpers and blocks. This review is

conducted monthly and the subject supervisor is required to initiate an Engineering Evaluation and Assistance Request (EEAR) if a specific jumper or block warrants a modification to the system. Management involvement in the jumper control program is now identified, controlled, and documented.

2) Maintenance

Board Recommendations

The Board recommends that the licensee's management improve their overview related to maintenance involving control room annunciators and the jumper control program. Licensee management should place more emphasis on meeting QA and QC requirements and on effective corrective action measures related to this area.

Response

See the District's response above regarding maintenance of control room annunciators and the jumper control program.

District management is cognizant of the importance of meeting QA/QC requirements and of a corrective action system to ensure the resolution of identified deficiencies in the maintenance area. Personnel additions during late 1981 and 1982 to the QA and QC departments have enhanced the District's ability to meet the auditing and control requirements delegated to these departments. The addition of a full time QA Manager in March, 1982 has also provided the District with additional support in the QA area.

To ensure District management is cognizant and can provide adequate direction to the QA/QC functions regarding plant activities such as maintenance, the Production Operations Action Log (POAL) was initiated in July, 1981. This log identifies and tracks deficiencies until resolution resulting from QA Deficiency Reports, QA Audits and Mini-Audits, Nonconformity Reports, Operations Incident Reports, and SARC Audits. Division management periodically reviews the POAL (normally weekly) and ensures that appropriate corrective actions are taken to resolve these deficiencies in a timely manner.

3) Personnel, Training, and Plant Procedures

Board Recommendations

The Board recommends that the licensee increase the involvement of management and shift supervision in the directing, monitoring, and managing of the training programs.

Response

The Board's recommendation for this functional area was derived from the evaluation conclusion that the District's "...apparent lack of adequate training staff may have contributed to inadequate training documentation and to late administration of annual re-qualification examinations. There was lack of systematic retraining for non-licensed personnel."

Since the SALP Board evaluation, additional improvements in the Fort Calhoun Station Training Department staffing and in-plant related training programs have been initiated. The staffing for the Training Department presently consists of three individuals, compared to one individual in mid-1981 due to the loss of two staff members. This has allowed the District to conduct licensed and non-licensed operator training and requalification examinations according to schedule, and to update individual training records with proper documentation. Implementation of a computerized tracking system for training activities has provided a monitoring tool for identifying when an individual requires training or retraining in a specific area.

Training for non-licensed operator positions has been restructured to provide additional job specific training for these positions. Non-licensed operators now receive lectures different from those provided licensed operators regarding job specific training, but are still included in selected licensed operator lectures covering general topics.

Recent implementation of division training programs for non-licensed personnel performing activities affecting quality at the Fort Calhoun Station demonstrates management concern and involvement in the improvement and qualification of District personnel. Division management is responsible for ensuring that applicable individuals receive training and for monitoring the progress and effectiveness of the individual's training. The non-licensed employee training program is also flexible in that it allows managers to initiate and implement improvements or changes as necessary to the program.

The District will also initiate an in-house training program for entry level Chemical and Radiation Protection (CRP) Technicians with limited formal training and/or previous experience. Development and determination of the program content is complete and the program will commence when the trainees are hired in the next few months. After completion of a three year training program, these trainees will then be qualified as ANSI N18.1-1971 Technicians and will perform both chemistry and health physics duties. The District believes that the CRP training program described above provides a viable solution to a continuing nationwide CRP Technician shortage problem that has affected the Fort Calhoun Station and the nuclear power industry.

Periodic Safety Audit and Review Committee (SARC) audits of the Fort Calhoun Station training program also ensure management involvement in plant training, since the SARC is comprised of District management personnel.

Shift supervisors are now involved in the performance evaluations of operations personnel. The shift supervisor has the opportunity during this evaluation phase to identify and recommend additional training for an individual if necessary.

The District believes that its record of continued safe operation and responsiveness to identified safety and Commission concerns is representative of an effective, well-managed training program.

4) Design Changes and Modifications

Board Recommendations

The Board recommends that the licensee concentrate additional management attention to remove the backlogs of engineering work and drawing revisions (updates) and complete design verification in a timely manner.

Response

The District's letter to the Commission, dated August 27, 1981, detailed the District's plan for a concerted effort to provide interim drawing revisions, implement design verification work, and remove the drawing backlog by December 31, 1983. Additionally, Standing Order G-21, "Station Modification Control," was revised in September, 1981 to better identify the modification control forms necessary to complete a design package and facilitate the inclusion of the modification into appropriate drawings. Increases in engineering and drafting personnel over the past year have allowed the District to commence the effort to update the drawings to their "as-built" condition and complete backlogged engineering work as necessary.

5) Radiation Protection

Board Recommendations

The Board recommends that the licensee complete an ALARA Program that meets the requirements stated in Regulatory Guide 8.8 at the earliest date possible.

Response

The District began implementation of an upgraded ALARA program on June 1, 1982, as detailed in the District's letters dated December 21, 1981 and June 1, 1982. The upgraded ALARA program is controlled by three basic documents. These documents are: (1) a Corporate Policy Statement, issued by the General Manager; (2) an administrative procedure, specifically Standing Order G-50, "ALARA Radiation Exposure Program"; and (3) ALARA operating procedures. The content and applicability of these three documents are detailed in the District's letter dated June 1, 1982.

6) Security and Safeguards

Board Recommendations

The Board recommends that licensee management become more deeply involved in completion of plans and procedures to meet 10 CFR 73 regulations.

Response

District management is aware of the responsibilities involved and the importance of an effective security and safeguards system for

the Fort Calhoun Station. Management involvement in Security Plan changes, review of Physical Security Event Reports to identify potential problem areas, and review of periodic QA and SARC Audits of the plant security program are examples of management's role in this area. Recent implementation of a Safeguards Information program and initiation of a QA Audit cycle for auditing contractor/vendor employee screening records, as detailed in the District's letters dated February 26 and April 1, 1982, demonstrate District management's responsiveness to security and safeguards issues. Management involvement, at all levels, in the initiation, implementation, and review of security related plans, procedures, and audits has ensured the existence of an effective and reliable security program at the Fort Calhoun Station.

7) Audits Review and Committee Activity

Board Recommendations

The Board recommends that the licensee designate a full time QA manager and become more closely involved in the certification of audit personnel and the evaluation of the audit program's effectiveness.

Response

A full time QA Manager was hired and commenced employment with the District in March, 1982. As detailed in QA Procedure (QAP) #18, "Auditor Training and Qualification," it is the responsibility of the QA Manager to ensure the certification of qualified QA auditing personnel. QA auditor and audit team leader qualifications are delineated in QAP #18 and these qualifications include the areas of education and/or experience, communication skills, training, audit participation, and completion of an examination. Additionally, based on an annual assessment, the QA Manager may extend the auditor's certification or require retraining and/or requalification as deemed appropriate.

The certification of Safety Audit and Review Committee (SARC) auditors has been ensured through the revision to SARC procedures to require qualification, as required by ANSI N45.2.23. Additionally, all present chairmen of SARC audit teams have been certified as lead auditors based upon training completed in April, 1982.

The biennial SARC audit of the District's QA program provides an excellent means for independently reviewing and evaluating the effectiveness of this program. Recommendations or deficiencies documented by the SARC audit are identified and tracked until resolution by the Production Operations Action Log. Based upon the above described certification programs and SARC audit activity, the District believes the Board's recommendations are now fulfilled.