



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

JUN - 3 1994

Docket: 50-285  
License: DPR-40

Omaha Public Power District  
ATTN: T. L. Patterson, Division Manager  
Nuclear Operations  
Fort Calhoun Station FC-2-4 Adm.  
P.O. Box 399, Hwy. 75 - North of Fort Calhoun  
Fort Calhoun, Nebraska 68023-0399

SUBJECT: NRC INSPECTION REPORT 50-285/94-07

Thank you for your letter dated May 13, 1994, in response to our letter and Notice of Violation dated April 13, 1994. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

A handwritten signature in dark ink, appearing to read "A. Bill Beach".

A. Bill Beach, Director  
Division of Reactor Projects

CC:  
LeBoeuf, Lamb, Leiby & MacRae  
ATTN: Mr. Michael F. McBride  
1875 Connecticut Avenue, NW  
Washington, D.C. 20009-5728

Washington County Board  
of Supervisors  
ATTN: Jack Jensen, Chairman  
Blair, Nebraska 68008

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LEO/11

Combustion Engineering, Inc.  
ATTN: Charles B. Brinkman, Manager  
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Nebraska Department of Health  
ATTN: Harold Borchert, Director  
Division of Radiological Health  
301 Centennial Mall, South  
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Lincoln, Nebraska 68509-5007

Department of Environmental Quality  
ATTN: Thomas Lamberson, Deputy Director  
P.O. Box 98922  
Lincoln, Nebraska 68509-8922

Fort Calhoun Station  
ATTN: James W. Chase, Manager  
P.O. Box 399  
Fort Calhoun, Nebraska 68023

JUN - 3 1994

bcc to DMB (IE01)

bcc distrib. by RIV:

L. J. Callan

DRSS-FIPB

Branch Chief (DRP/D)

RIV File

Senior Resident Inspector - Cooper

Resident Inspector

MIS System

Project Engineer (DRP/D)

Branch Chief (DRP/TSS)

Leah Tremper, OC/LFDCB, MS: MNBB 4503

RIV:DRP/A <i>JW</i>	C:DRP/A <i>J</i>	D:DRP		
WBJones;df	WDJohnson	ABBeach		
6/2/94	6/2/94	6/3/94		

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6/2/94	6/2/94	6/2/94		

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Omaha Public Power District  
444 South 16th Street Mall  
Omaha, Nebraska 68102-2247  
402/636-2000

May 13, 1994  
LIC-94-0098

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 (A.B. Beach) to OPPD (T.L. Patterson) dated April 13, 1994

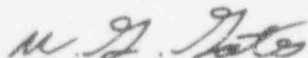
Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/94-07, Reply to a Notice of Violation (NOV)

The subject report transmitted a NOV resulting from an NRC inspection conducted February 13 through March 26, 1994 at the Fort Calhoun Station. Attached is the Omaha Public Power District (OPPD) response to this NOV.

If you should have any questions, please contact me.

Sincerely,



W. G. Gates  
Vice President

WGG/epm

Attachment

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

9405180253  
94-1046

REPLY TO A NOTICE OF VIOLATION

Omaha Public Power District  
Fort Calhoun Station

Docket: 50-285  
License: DPR-40

VIOLATION

During an NRC inspection conducted on February 13 through March 26, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 5.8.1 states, in part, "Written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed . . . Appendix A of U.S. NRC Regulatory Guide 1.33 . . ."

Section 7.e.(1) of Regulatory Guide 1.33 lists radiation protection procedures governing access control to radiation areas, including a radiation work permit system.

Section 5.1.10 of Procedure RP-AD-200, "Radiation Protection Administration Procedure," requires that all personnel shall log in and out of the access control system for each radiologically controlled access entry. Section 5.3.2.A requires that personnel entering the radiologically controlled area wear approved personnel monitoring equipment.

Radiation Work Permits 94-3015 required that individuals have a thermoluminescent dosimeter and an alarming dosimeter.

Contrary to the above, on March 15 1994, an individual, working in accordance with Radiation Work Permit 94-3015, entered the radiologically controlled area without logging into the access control system and without his alarming dosimeter turned on.

This is a Severity Level IV violation (Supplement IV) (285/9407-03)

OPPD RESPONSE

A. The Reason for the Violation

This violation is the result of a lack of attention-to-detail on the part of the individual involved.

B. Corrective Steps That Have Been Taken and the Results Achieved

1. Additional emphasis on RP requirements are now included in Initial General Employee Training (GET) as well as Requalification GET. This emphasis includes a video tape demonstration on the access control procedure and a question and answer session. The individual involved with this incident had not yet received this training. This was incorporated into GET on January 3, 1994.
2. The individual who made this improper entry is restricted from access to the radiologically controlled area until he has completed the new Requalification GET. The restriction was placed on the individual's access to the radiologically controlled area on March 15, 1994.
3. RP requirements for radiation control practices in the RCA were previously delineated in at least four RP department procedures. To ensure that OPPD expectations and requirements for RCA entries are clearly defined, RP requirements that apply to station personnel were incorporated into Fort Calhoun Station Standing Order G-101, "Radiation Worker Practices". This procedure was issued April 5, 1994.
4. As an interim measure until the RCA access area has been upgraded, the Security Post "R3 and R4 Staging Area" has been relocated to the exit of the RCA access area. The Security Guards at this relocated post have been given the responsibility of ensuring personnel do not enter through the exit gates. This was completed March 29, 1994.
5. The individual who entered the RCA with improper dosimetry was counseled on the importance of self-checking and the seriousness of this event. Formal disciplinary action was also taken. In addition a briefing covering the event was given to each craft area by the first line maintenance supervisors. These actions were completed on April 6, 1994.

C. Corrective Steps That Will Be Taken to Avoid Further Violations

1. The Radiation Worker Requalification Training program has been revised to incorporate "RCA Access Skills Training", as noted in item B.3 on page 2. All access qualified personnel will receive the enhanced training by January 31, 1995.
2. The RP access control area is in the process of being renovated. ECN 93-609 has been approved to change the access control area traffic flow patterns and implement a streamlined access control system. This will assist in ensuring that personnel entering the RCA have proper dosimetry. This ECN will be completed by October 30, 1994.
3. The Fort Calhoun Station has established a Performance Enhancement Process (PEP) team which is currently evaluating personnel performance, RP program operations, and management communications in order to identify potential problems. Recommendations from this team will be completed by June 1, 1994. An implementation schedule will be developed by June 30, 1994.
4. Independent from the PEP process a root cause analysis investigation will be performed by plant personnel to insure that any specific problems unique to this incident are corrected. The investigation will be completed by June 15, 1994. A corrective action schedule will be developed by June 30, 1994.

D. Date When Full Compliance Will Be Achieved

OPPD is presently in full compliance based on the completed actions listed above.