



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

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

OCT 27 1994

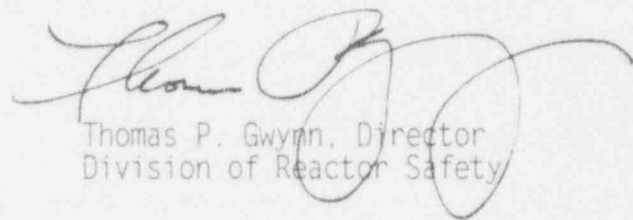
Docket: 50-285  
License: DPR-40

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 50-285/94-09

Thank you for your letter of September 30, 1994, in response to our letter and Notice of Violation dated August 31, 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,



Thomas P. Gwynn, Director  
Division of Reactor Safety

CC:  
LeBoeuf, Lamb, Greene & MacRae  
ATTN: Mr. Michael F. McBride  
1875 Connecticut Avenue, N.W.  
Suite 1200  
Washington, D.C. 20009-5728

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

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Combustion Engineering, Inc.  
ATTN: Charles B. Brinkman, Manager  
Washington Nuclear Operations  
12300 Twinbrook Parkway, Suite 330  
Rockville, Maryland 20852

Nebraska Department of Health  
ATTN: Harold Borchert, Director  
Division of Radiological Health  
301 Centennial Mall, South  
P.O. Box 95007  
Lincoln, Nebraska 68509-5007

Nebraska Department of Health  
ATTN: Dr. Mark B. Horton, M.S.P.H.  
Director  
P.O. Box 950070  
Lincoln, Nebraska 68509-5007

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

E-Mail report to D. Sullivan (DJS)

bcc to DMB (IE01)

bcc distrib. by RIV w/enclosure:

L. J. Callan	Resident Inspector
DRSS-FIPB	MIS System
Branch Chief (DRP/A)	Project Engineer (DRP/A)
RIV File	Branch Chief (DRP/TSS)
Senior Resident Inspector - Cooper	Leah Tremper, OC/LFDCB, MS: MNBB 4503
D. Powers (DRS/MB)	
C. Johnson (DRS/MB)	
DRS AI File (94-91)	

RIV:RI:MB <i>cas</i>	C:MB <i>DP</i>	D:DRS <i>cas</i>	D:DRP	D:DRS <i>DP</i>
CEJohnson/lb	DAPowers	TPGwynn	ABBeach <i>JW</i>	TPGwynn
10/20/94	10/20/94	10/21/94	10/27/94	10/27/94

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RIV:RI:MB	C:MB	D:DRS	D:DRP	D:DRS
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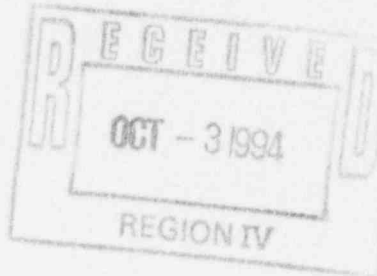
**Omaha Public Power District**

P.O. Box 399 Hwy. 75 - North of Ft. Calhoun Fort Calhoun, NE 68023-0399  
402/636-2000

September 30, 1994

LIC-94-0185

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 (T. P. Gwynn) to OPPD (W. G. Gates) dated August 25, 1994
  3. Letter from NRC (T. P. Gwynn) to OPPD (W. G. Gates) dated August 31, 1994

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/94-09 Reply to a Notice of Violation (NOV)

Reference 3 transmitted a NOV resulting from an NRC inspection conducted June 20 through July 15, 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*

W. G. Gates  
Vice President

WGG/jrg

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

95-0005

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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 June 20 through July 15, 1994, a 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:

Criterion V, Appendix B of 10 CFR Part 50, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

The Fort Calhoun Quality Assurance Plan, Revision 3, Section 2.1, paragraph 4.2.1, states, in part, that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

Standing Order SO-G-6, "Housekeeping," Revision 49, issued on June 21, 1994, specified housekeeping requirements, in part, for the control of ladders and combustible materials. Section 5.2.6 of Revision 49 specified the storage requirement for ladders. Section 5.2.6 required that ladders, which are upright, may not be left unattended unless they are properly secured to ensure personnel and equipment safety.

Contrary to the above, on June 23, 1994, the inspector observed that an upright wooden step ladder was left unattended and unsecured in the main control board panel walkway.

This is a Severity Level IV violation (Supplement I) (285/9409-01).

OPPD RESPONSE

1. The Reason for the Violation

The reason for this violation was determined to be a failure to communicate management expectations to station personnel. Just prior to identification of the violation, Standing Order SO-G-6 had been revised to better establish accountability for station housekeeping requirements. However, the task of informing plant personnel of the revised requirements had not been completed.

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

In response to the housekeeping discrepancy discussed in the Notice of Violation, Maintenance Work Order (MWO) 941798 was initiated to inspect and correct any housekeeping concerns associated with station instrument panels. The MWO has been completed, with all panels being left in compliance with the requirements of SO-G-6.

A Training Hotline has been issued to supervisory personnel assigned responsibility for housekeeping areas associated with the revision of SO-G-6.

Periodic housekeeping inspections are conducted as specified in SO-G-6, and involve the Plant Manager and various department heads. These inspections provide a mechanism to reinforce management expectations with respect to housekeeping issues.

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

Selected department heads have been tasked with briefing their personnel regarding management's expectations for station housekeeping practices. The briefings will include a discussion of recent changes to SO-G-6, and management's expectations for all personnel with respect to housekeeping practices at Fort Calhoun Station. These briefings will be completed by October 31, 1994.

Housekeeping responsibilities of station employees, as currently covered in General Employee Training and Conduct of Maintenance Training, will be reviewed by December 31, 1994, to ensure appropriate content and ensure that emphasis is placed on management's expectations.

The storage of ladders within operating areas of the station will be addressed by installation of permanent storage locations for ladders. Locations for ladder storage racks have been identified throughout the station and the new racks will be installed by January 1, 1995.

4. Date When Full Compliance Will Be Achieved

OPPD is presently in full compliance.