

OCT - 4 1991

Docket No. 50-285
License No. DPR-40

Omaha Public Power District
ATTN: W. G. Gates, Division Manager
Nuclear Operations
444 South 16th Street Mall
Mail Stop 8E/EP4
Omaha, Nebraska 68102-2247

Gentlemen:

SUBJECT: OPERATOR LICENSING MEETING

On September 27, 1991, a meeting was held in the Region IV office to discuss "Challenges and Changes" in the Operator Licensing Program. We thank the members of your staff who were in attendance and we appreciate their attention and candid response to operator licensing issues that concern the utilities and NRC.

We would like to thank Messrs. J. O'Hearn, J. Dutton, and G. Weldon for their presentations and providing the licensee's perspective of those issues.

If you have any questions or comments please contact me.

Sincerely,

Original Signed By
A. B. Beach

A: Bill Beach, Director
Division of Reactor Projects

Enclosures:

1. Attendance List
2. Meeting Slides

cc w/enclosures:

Omaha Public Power District
ATTN: J. K. Gasper, Manager
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P.O. Box 399
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RIV:OLS
JKeeton/cjg
10/2/91

C:OLS
JPellet
10/2/91

D:DRS
SJCOT/ins
10/2/91

D:DRP
ABBeach
10/4/91

10/2/91

ATTENDANCE LIST

ARKANSAS NUCLEAR ONE

E. Force

COMANCHE PEAK

J. Walker
J. Blackwell
R. Cole
M. Dean

COOPER NUCLEAR STATION

J. Dutton
V. Stairs
R. Creason

FORT CALHOUN

M. Lazar
H. Herman

FORT ST. VRAIN

M. Denniston
C. Stolley-Faust

RIVER BEND

D. Andrews
R. Jackson
J. Venable
G. Degraw
J. McGhee

SOUTH TEXAS

W. Kinsey
G. Weldon
J. Bartlett
N. Midkiff

WATERFORD-2

C. Toth
J. O'Hearn
J. Culliton

WOLF CREEK

J. Gilmore
E. Taylor
G. Smith

NRC

S. Collins
B. Dean
J. Pellet
S. McCrory
J. Keeton
K. Kennedy
R. Lantz
E. Himes

OPERATOR LICENSING MEETING - CHALLENGES AND CHANGES

September 27, 1991

10:00-10:30	Welcome - S. Collins, Director, Division of Reactor Safety
	Impact of operators on safety
	Shutdown risk
	Emergency Operating Procedure adequacy
	Program changes from feedback
	Introduction of staff & attendees - J. Pellet
10:30-11:00	120 day VP-letter & requesting material 90 days in advance - K. Kennedy
	Operator addresses & other VP letter changes - K. Kennedy
	Maintenance of facility material sets - K. Kennedy
11:00-11:15	Regional Administrator call before requalification exams - R. Lantz
	When & how to send 398s & 396s, privacy issue & # copies - J. Pellet
11:15-11:30	Requalification exams for previous passes - J. Keeton
11:30-11:45	What is a sample plan for requalification exams - S. McCrory
11:45-12:15	Lessons learned from recent requalification exams - S. McCrory
12:15-12:30	Break
12:30-1:00	Pilot requalification program experience - W3: J. O'Hern
1:00-1:30	Problems maintaining SROs working as ROs - CNS: J. Dutton
1:30-1:45	Part 55 fitness for duty changes - J. Pellet
	Initial examination status and changes - J. Pellet
	GFES status and process - J. Pellet
1:45-2:15	Concerns about exam banks (What's a "lookup") - STP: G. Weldon
2:15-2:30	Closing remarks, questions, and answers - J. Pellet

**REGION IV
OPERATOR LICENSING**

(817)860-8xxx

John Pellet - x159

**Eileen Himes - x253
Licensing Assistant**

**Jack Keeton - x240
Comanche Peak
Arkansas Nuclear One**

**Kriss Kennedy - x147
River Bend
Waterford 3
Fort Calhoun**

Ryan Lantz - x158

**Steve M^cCrory - x265
South Texas Project
Wolf Creek
Cooper**

CHANGES TO VP LETTERS

INITIAL EXAMINATIONS

- Sending to facilities 120 days prior to examination
- Requests reference material 90 days prior to examination
 - Provides greater flexibility for exam preparation
 - This is a request. Reference material still required 60 days prior to examination.

REQUALIFICATION EXAMINATIONS

- Requires current mailing address for each proposed operator
- Requests identification of crew composition for all on-shift crews

MAINTENANCE OF FACILITY MATERIAL SETS

- We now have a library large enough to maintain a "controlled copy" of reference material for each facility.
- We would like to discuss getting on controlled distribution for the material listed below. Who do we talk to? How do region and facility ensure that what we have is correct?
 - Complete procedure index
 - Administrative procedures only applicable to reactor operation or safety
 - All integrated plant procedures (normal or general operating procedures)
 - Emergency procedures (emergency instructions, abnormal or special procedures)
 - Surveillance procedures that are performed by licensed operators in the Control Room (CR) as well as routine ESF surveillances performed locally
 - Fuel handling and core loading procedures
 - Annunciator/alarm procedures for CR annunciators (including Fire Protection alarm procedures)
 - Radiation protection manual (radiation control manual or procedures)
 - Emergency plan implementing procedures as used in the CR
 - Technical Specifications and interpretations
 - System operating procedures
 - Piping and instrumentation diagrams, electrical single line diagrams, or flow diagrams
 - Technical Data Book and/or plant curve information as used by operators and facility precautions, limitations, and setpoints (PLS)
- Prior to each exam, provide the remaining items listed in Enclosure 1 of the VP letter.
 - Training material (lesson plans, student handouts, system descriptions, simplified diagrams)
 - JPM's
 - Standing orders
 - Written exam bank (optional)
 - KA catalog (if plant specific)
 - Simulator material
- All procedures and reference material need to be bound and labelled with appropriate indices. Normally we want it in the form used in the CR.
- Lead examiners will work with facilities to "fine tune" reference material needs.
- Contractors will need reference material appropriate to their level of effort. This will be determined for each exam.

APPLICATIONS AND MEDICAL INFORMATION SUBMITTALS

(NRC FORM 398s & 396s)

BOTH

- NRC has to be careful with personal privacy information on operators (e.g., home addresses, medical reports, etc.).
- Please do not send personal privacy information, such as medical results, on general distribution to the Document Control Desk.
- Applications (398s & 396s) do not need to go to anyone outside the region.

398s

- Individuals' docket numbers are listed in the GFES results. These numbers should be transferred to license applications in the docket number block (block 6.a.).
- The instructions say send the original and 2 copies of the 398/396 but be aware we only use the original (we may see a change in the instructions).
- Please mark preliminary applications as preliminary or draft to help our handling of them. That way we know what you think they are.
- Preliminary applications should be in the region a month before the exams. Final signed applications should be in the region two weeks before the exams. If you can not meet these days, be sure to discuss it with the Chief Examiner.

396s

- We don't need notification of temporary medical problems. Fitness-for-duty rule change will impact medical reporting.
- 396s with blocks 4 or 5 checked must supply complete medical information so our doctor can review. Limited information related to the problem is often not enough.

REQUALIFICATION EXAMINATIONS FOR PREVIOUS PASSES AND NEW LICENSES

REASONS FOR CONCERN

- Pool of licensees requiring NRC exam for renewal is decreasing.
- Crew reconstitution between NRC audits.

NRC CONCERNS FOR VALID PROGRAM EVALUATION

- Operating crews should be evaluated as constituted even though only one or two individuals require exam for renewal.
- Crews should neither be split nor reconstituted just for our examination.
- If new licensees are assigned to that crew they will be expected to take the entire examination even though they may not have completed a training cycle.

EVALUATION REQUIREMENTS: 12 OR MORE NEEDED FOR PROGRAM AUDIT

- If at least 12 need the NRC exam for renewal, then previous passes will only be subject to NRC requal during the crew evaluation simulator. Previous passes will not be required to perform critical tasks, but, their mis-performance will not be ignored.
- If <12 need renewal, we recognize that the two year program evaluation interval presents a problem which we are reviewing.

STATUS OF RETAKES FOR PROGRAM EVALUATION

- Retakes will not be counted in the 12 individuals required for program evaluation.

REQUALIFICATION LESSONS LEARNED

PROCESS

- Stress - greatly reduced by sharing information concerning the process and careful scheduling (dead time between activities).
- Critical tasks/elements - still poorly understood (identification and performance standards), ISCTs some adverse impact on crew performance.
- Still confusion over contents of written examination and use of static simulator (Region to propose revision).
- Question quality increasing, but still largely at low cognitive levels.
- Facilities not aware that EAL classification must have safety significance to be considered critical for SROs (\geq ALERT).
- Requirements for evaluating SROs in use of EOPs (rotation not mandatory).
- Final review of understanding of examination at end of prep week important.
- Conducting the same event for several crews/examinees in the same day significantly reduces development effort (pre-load scenarios as ICs).

OPERATOR PERFORMANCE

- Crew communications & EOP use major factors in SAT/UNSAT performance.
- Weak or confusing EAL guidance in EIPs impact SRO evaluations.
- Non-supervisory SROs have difficulty in supervisory positions.
- "Testitis" affecting crew/individual performance (canned scenarios, unrealistic expectations, examination environment conditioning).

GENERAL

- Facility senior management understanding of requalification evaluation.
- Frequency and nature of interaction between training and operations major factor in performance on evaluations.
- Facilities allowing programs to be driven by individual examiners.

LICENSED OPERATOR REQUALIFICATION EXAMINATION PILOT

PROGRAM CHANGES

DYNAMIC SIMULATOR

CREW CRITICAL TASKS

CREW COMPETENCY SHEETS USED

NRC EVALUATES CREW ONLY

UTILITY EVALUATES CREW & INDIVIDUAL

JOB PERFORMANCE MEASURES

EACH EXAMINEE PERFORMS SEVEN

NO PRESCRIPTED QUESTIONS

TWO FOCUSED JPM's USED TO EVALUATE
SIMULATOR WEAKNESSES IF NECESSARY

LICENSED OPERATOR REQUALIFICATION
EXAMINATION
PILOT

UTILITY COMMENTS

ADVANTAGES

CREW STRESS REDUCED

MORE CLOSELY EVALUATES CREW
PERFORMANCE

ALLOWS CREW TO PERFORM AS A CREW

ABILITY FOR CREW TO MISS ONE CRITICAL TASK
AND NOT HAVE A MANDATED FAILURE

JPM ADMINISTRATION MORE EFFICIENT

DISADVANTAGES

FOCUSED JPM's DIFFICULT TO WRITE

FOCUSED JPM's ABILITY TO EVALUATE SOME
SIMULATOR WEAKNESSES IS QUESTIONABLE

COMPETENCY RATINGS NEED CLARIFICATION

METHOD OF NRC EVALUATION ON UTILITY
INDIVIDUAL EVALUATIONS IS UNKNOWN

CHANGES TO PART 55
due to
FITNESS-FOR-DUTY CONCERNS

In 55.53, paragraph (j) is redesignated as paragraph (i) and new paragraph (j) and (k) are added to read as follows:

(j) The licensee shall not consume or ingest alcoholic beverages within the protected area of power reactors, or the controlled access area of non-power reactors. The licensee shall not use, possess, or sell any illegal drugs. The licensee shall not perform activities authorized by a license issued under this part while under the influence of alcohol or any prescription, over-the-counter, or illegal substance that could adversely affect his or her ability to safely and competently perform his or her licensed duties. For the purpose of this paragraph, with respect to alcoholic beverages and drugs, the term "under the influence" means the licensee exceeded, as evidenced by a confirmed positive test, the lower of the cutoff levels for drugs or alcohol contained in 10 CFR Part 26, Appendix A, of this chapter, or as established by the facility licensee. The term "under the influence" also means the licensee could be mentally or physically impaired as a result of substance use including prescription and over-the-counter drugs, as determined under the provisions, policies, and procedures established by the facility licensee for its fitness-for-duty program, in such a manner as to adversely affect his or her ability to safely and competently perform licensed duties.

(k) Each licensee at power reactors shall participate in the drug and alcohol testing programs established pursuant to 10 CFR Part 26. Each licensee at non-power reactors shall participate in any drug and alcohol testing Program that may be established for that non-power facility.

In 55.61, new paragraph (b)(5) is added to read as follows:

(5) For a sale, use or possession of illegal drugs, or refusal to participate in the facility drug and alcohol testing program, or a confirmed positive test for drugs, drug metabolites, or alcohol in violation of the conditions and cutoff levels established by 55.53(j) or the consumption of alcoholic beverages within the protected area of power reactors or the controlled access area of non-power reactors, or a determination of unfitness for scheduled work as a result of the consumption of alcoholic beverages.

CHANGES TO PART 2 APPENDIX C
due to
FITNESS-FOR-DUTY CONCERNS

In Section V. E., the following paragraph is added to the end of the section:

E. Enforcement Actions Involving Individuals

* * * * *

In the case of a licensed operator's failure to meet applicable fitness-for-duty requirements (10 CFR 55.53(j)), the NRC may issue a notice of violation or a civil penalty to the Part 55 licensee, or an order to suspend, modify or revoke the license. These actions may be taken the first time a licensed operator fails a drug or alcohol test, that is, receives a confirmed positive test that exceeds the cutoff levels of 10 CFR Part 26 or the facility licensee's cutoff levels, if lower. However, normally only a notice of violation will be issued for the first confirmed positive test in the absence of aggravating circumstances such as errors in the performance of licensed duties. In addition, the NRC intends to issue an order to suspend the Part 55 license for up to three years the second time a licensed operator exceeds those cutoff levels. In the event there are less than three years remaining in the term of the individual's license, the NRC may consider not renewing the individual's license or not issuing a new license after the three year period is completed. The NRC intends to issue an order to revoke the Part 55 license the third time a licensed operator exceeds those cutoff levels. A licensed operator or applicant who refuses to participate in the drug and alcohol testing programs established by the facility licensee or who is involved in the sale, use, or possession of an illegal drug is subject to license suspension, revocation, or denial.

In Section VIII., the new paragraph below is added.

VIII. Responsibility

* * * * *

(8) Any proposed enforcement action involving a civil penalty to a licensed operator.

WHAT IS A
DIRECT LOOK UP
QUESTION ?

DEFINITION Vs. INTERPRETATION

DEFINITION

"A question which immediately directs an operator to a particular reference where the answer is readily available"

INTERPRETATIONS

1. If the name or number of the procedure with the correct answer is in the question, then the question is a "Direct Look Up".
2. If I read the question and know where to find the answer, then the question is a "Direct Look Up".
3. If it is an easy question, the question is a "Direct Look Up".

PROBLEM

- Utilities in Region IV as indicated by Requal Exam Reports have Exam Bank deficiencies that include "Direct Look Up" questions such that the operator was led to the answer or reference with no synthesis or analysis required.
- Test items developed to meet the multiple interpretations are frequently not straight forward or address more obscure or unnecessary information.
- The result is an initial high level of difficulty (>40% failures at STP).
- To compensate, Requal Training is directed at the more obscure information.
- The Requal Program is now based on Test Items; NOT, the Systematic Approach to Training!

EXAMPLES of the PROBLEM INTERPRETATIONS EXCLUDE VALID QUESTIONS

- EXAMPLE # 1;(Attachment #1) The name and number of the procedure with the correct answer is in the question, but ANALYSIS/SYNTHESIS are required to determine the correct answer.
- EXAMPLE # 2;(Attachment #2) All information directs the operator to the Off Normal Procedure for Station/Instrument Air, but Evaluation/Analysis Synthesis is required to determine the correct answer.

Attachment 1

Example #1 - Question

The plant is responding to a large break LOCA.

The Operators are on Step 4.b of 0POP05-EO-ES13, Transfer to Cold Leg Recirculation, and are unable to open the VCT outlet valves from the control room.

At this point, the STA announces that containment pressure has just risen to 9.7 psig.

The operators should:

- a. go immediately to FRZ1, Response to High Containment Pressure, Step 1.
- b. verify no CST red paths exist, and then go to FRZ1, Response to High Containment Pressure, Step 1.
- c. complete step 4 of ES13, and then go to FRZ1, Response to High Containment Pressure, Step 1.
- d. complete ES13 through step 5, and then go to FRZ1, Response to High Containment Pressure, Step 1.

ANSWER:

- d. complete ES13 through step 5, and then go to FRZ1, Response to High Containment Pressure, Step 1.

REFERENCE:

- (1) 0POP05-EO-ES13, TRANSFER TO COLD LEG RECIRCULATION, Rev.0

Attachment 1

Proposed STP Evaluation

This question states an exact reference in the question body. The correct answer is in the designated reference. The statement can be made that the question statement "on Step 4.b of 0POP05-EO-ES13, Transfer to Cold Leg Recirculation" directs the operator to a procedure where the answer is located.

The key element in this example is "*Does the question IMMEDIATELY direct the operator to a particular reference which contains the answer?*" Analysis of the question body leads to the conclusion that the operator is NOT IMMEDIATELY directed for the following reasons:

- (1) The question also gives information that directs an operator to Function Restoration Procedure (FRP) 0POP05-EO-FRZ1, Response to High Containment Pressure.
- (2) The question is an Operating Philosophy type question which directs an operator to 0POP01-ZA-0018, Emergency Operating Procedure Operating Guide which contains the question's distractors in its guidance for implementing FRPs.
- (3) The operator must make a decision/choice based on analysis/synthesis/evaluation of more than one statement in the question to determine which procedure to go to for guidance in answering the question

Attachment 1

Example #1 - Predicted NRC Evaluation

In the question stem, the operator is immediately directed to 0POP05-EO-ES13, Transfer to Cold Leg Recirculation. 0POP05-EO-ES13 contains a note which states,

"Steps 1 through 5 should be performed without delay. Function restoration procedures should NOT be implemented prior to completion of these steps."

To answer this question, the operator simply refers to the procedure which is stated in the question stem and reads the note.

Therefore, the correct answer must be "d".

The argument stated for this question not direct look up is that there is synthesis involved since the operator cannot determine the reference by looking at only one statement (The operator must also look at FRZ1 to answer the question, therefore two (2) statements). This really has no bearing on whether or not the operator is immediately directed to ES13. Even if he looks at 0POP05-EO-FRZ1 (as he should), he was still immediately directed to ES13.

Attachment 2

Example #2

The plant is at 100% power.

An event occurs with the following control room indications:

COMPONENT/INDICATION	STATUS/READING
IAS HEADER PRESS LOW	LIT
SA TO IA C/O VALVE OPEN	LIT
IA Air Compressors	RUNNING
SAS/IA Crossover Valve	OPEN
IAS to Yard Isolation Valve	CLOSED
IAS Dryer Bypass Valve	OPEN
IA Header Pressure	68 psig

No valves that rely on instrument air for operation have changed position at this time.

The action that should be taken is to:

- have an operator place the standby air dryer in service.
- place the control switches for all compressors in the MANUAL position.
- have an operator verify instrument air header pressure locally prior to other actions.
- trip the reactor.

ANSWER:

- Trip the reactor.

REFERENCES:

- 1POP04-IA-0001, Loss of Instrument Air, Rev. 1

Attachment 2

Example #2 - Proposed STP Evaluation

The indications given in the question table could IMMEDIATELY direct an operator to IPOP04-IA-001, Loss of Instrument Air.⁵ The correct answer is available in the this reference.

The key element in this example is "... in which the answer is READILY AVAILABLE". Analysis of the question body leads to the conclusion that the answer is NOT READILY AVAILABLE for the following reasons:

- (1) READILY AVAILABLE implies that the answer would stand out and not require any analysis/synthesis/evaluation on the part of the operator. The example gives Instrument Air system indications and parameters which must be compared to procedure sections i.e. symptoms, precautions, etc. to determine what indications are valid and how they are evaluated to determine the status of the system and the correct action to take.
- (2) The operator must make a decision/choice based on analysis/synthesis/evaluation of more than one statement in the question to determine the correct action to take which implies the question is NOT a DLU.

⁵ According to OPOP03-ZO-0004, Plant Conduct of Operations, Rev.11, "...Annunciator Response Procedures should be utilized for verification of proper automatic and immediate actions and guidance for subsequent actions." If this direction is used, then the question does NOT IMMEDIATELY DIRECT the operator to the reference where the answer is located, part 1 of the statement is in effect, and the question is NOT a direct lookup.

Attachment 2

PART 2, Example #2 - Predicted NRC Evaluation

The argument stated in the drafted explanation for direct look up pertaining to this question is that the operator must make a decision (therefore demonstrate synthesis) based on more than one statement in the question stem.

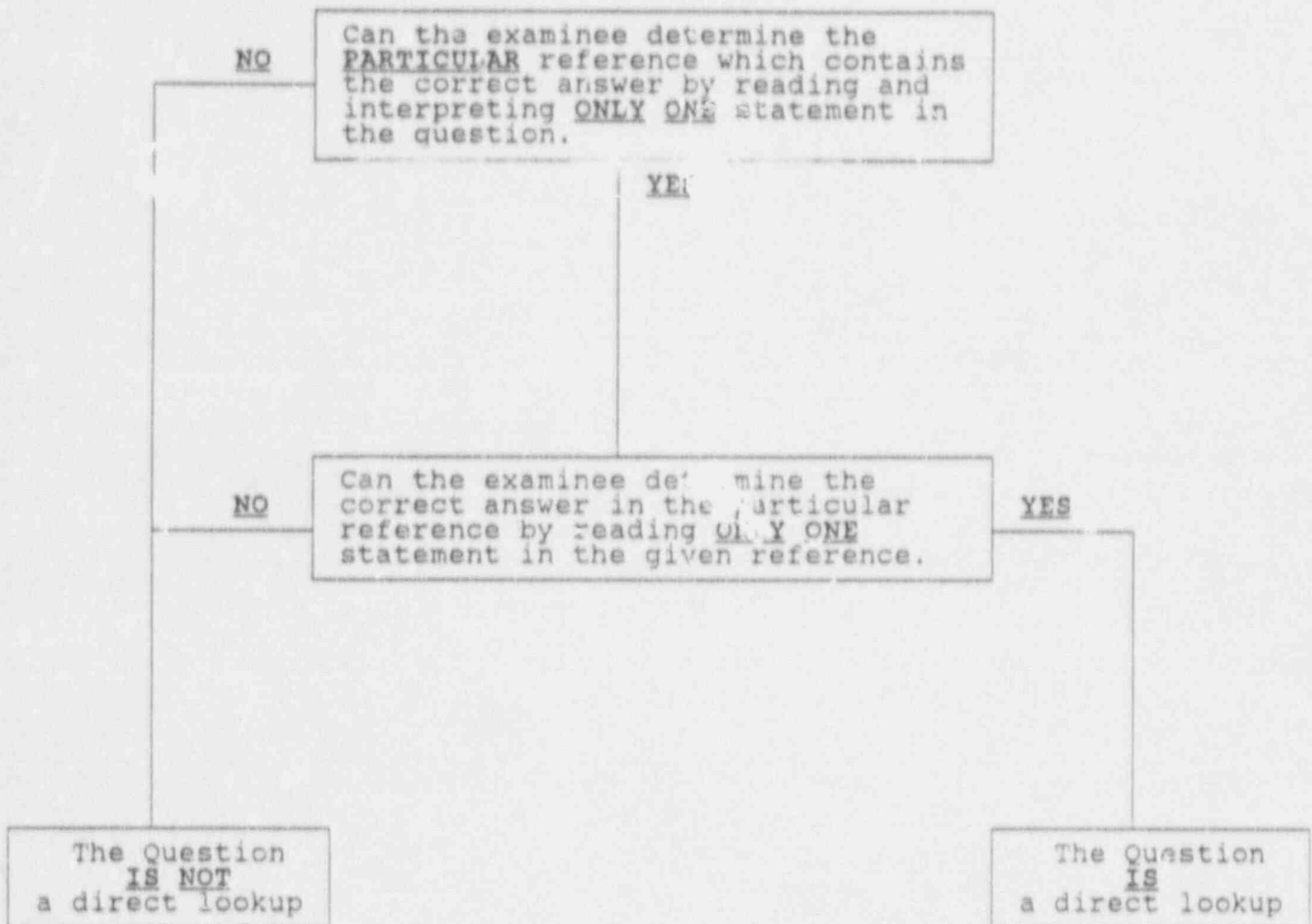
In this case the operator reads the procedure until he comes to the step which states that the reactor should be tripped if LA pressure is less than 70 psig. This question is contrary to the guidance in ES-602 which says the questions should require the operators to "produce organized responses and satisfactory solutions to job related problems and issues" and should be judged a direct look up.

Again, by saying that if the operator has to look at more than one statement in the reference it is not a direct look up, we have fallen short of the requirements of NUREG-1021.

Attachment 3

DIRECT LOOKUP STATEMENT

STP PROPOSED FLOWCHART



Attachment 3

Flow Chart Justification

A "direct lookup question" is defined as a question which immediately directs an operator to a particular reference where the answer is readily available.¹

To analyze the meaning of this statement, it is necessary to divide the statement into two parts. The first part of the statement deals with the "speed" at which the operator is directed to a reference which contains the answer. The last part of the statement deals with the "ease" with which the answer can be formulated once the correct reference is determined. This analysis of the statement adequately makes a distinction between a competent and an incompetent operator or whether the question meets a required level of knowledge.²

Example Questions and Explanations for each part follow the Statement Analysis.

PART 1 ANALYSIS:

A question which IMMEDIATELY directs an operator to a particular reference where the answer is ...

This part of the statement deals with whether the question directs/aims/focuses/steers/points/guides the operator to a reference which contains the answer. An important aspect of this part of the statement is the inclusion of the adverb IMMEDIATELY.

The use of "immediately" seems to imply that NO analysis/synthesis/evaluation of the question body is required to determine which reference should be used. The need to compare/discriminate/choose/decide which procedure contains the correct answer based on more than one statement or set of conditions contradicts the notion of IMMEDIATE DIRECTION to a particular procedure.

Using the above distinction between IMMEDIATELY DIRECTS and the necessity to evaluate more than one item, the question used in the first step of the DLU flowchart was developed:

"Can the examinee determine the PARTICULAR reference which contains the correct answer by reading and interpreting ONLY ONE statement in the question?"

¹ NUREG-1021, Section ES-602, Rev. 6, 06/01/90, Page 26 of 27, "NRC CHECKLIST FOR OPEN REFERENCE TEST ITEMS", Item Level #6

² NUREG-1021, Section ES-602, Rev. 6, 06/01/90, Attachment 1, "GUIDELINES FOR THE DEVELOPMENT AND REVIEW OF OPEN REFERENCE EXAMINATIONS", Table 1, "LEVEL OF KNOWLEDGE DESCRIPTIONS AND EXAMPLES", Page 21 of 27

Flow Chart Justification (cont'd)

PART 2 ANALYSIS:

...readily available.

Many questions are constructed in a "given plant conditions/indications, determine..." format. The operator must analyze/synthesize/evaluate the data to determine the correct response. Plant operations guidelines state "Instruments and alarms should be verified by comparison with other instruments or alarms, whenever possible,"³ and "Operating personnel should resolve differences in indications resulting from redundant instruments measuring the same parameter before operations dependent on that instrument are performed."⁴ If the operator implements these directives, he must EVALUATE all the given data, COMPARE the data to the appropriate sections of the procedure i.e. symptoms, entry conditions, precautions, etc., and DECIDE upon the correct action to take.

Using the above distinction between READILY AVAILABLE and the necessity to evaluate more than one item or statement to determine the answer, the second step of the DLU flowchart was developed:

Can the examinee determine the correct answer in the particular reference by reading ONLY ONE statement in the given reference.

³ OPOP03-ZO-0004, Plant Conduct of Operations, Rev.11, Section 4.4.4

⁴ OPOP03-ZO-0004, Plant Conduct of Operations, Rev.11, Section 4.4.4.1

INITIAL EXAMINATION CHANGES

- Working now on what should be changed or evolved next. What is your input?
- Changes will not be sudden but rather phased in carefully.
- Examination needs and schedules are attached. Please let us know of changes as soon as possible.
- NES sets the months, but we can adjust 1 month on either side in the region, and further if it is a real hardship through the program office.

GENERIC FUNDAMENTALS EXAMINATION CHANGES

- Administered at each site with candidates.
- Next exam is October 8, 1991.
- Exams to be express mailed with detailed instructions to each facility contact about October 1, 1991.
- Facility contact to inform our Licensing Assistant when package received.

FY	ANO1	ANO2	CP	CNS	FCS	RB	STP	WF3	WC
92	12/24/92 1 SRO 5 UG	6/1/92 16 RO 6/8/92 RO	6/22/92 12 RO 3 SRO 4 UG	11/11/91 RO-16 11/18/91 RO 11/91 RT	10/21/91 RO-12 10/28/91 RO 10/21 45 7R 4U	12/2/91 RO-12 12/9/91 RO 12/9/91 OR 3U	3/92 RO-28	2/17/92 10 RO	
93	8/24/92 11 RO 3 SRO	7/6/92 6 RO 4 UG 1 SRO		5/18/92 3 RO	6/15/92 6 RO 3 SRO	7/20/92 4 RO 4 UG (RT + UG)	9/21/92 5 RO 1 SRO 9 UG	9/14/92 PT	
93	3/93 20 RO 10 RO	7/93 4 UG 6 RO	11/16/92 RT	11/92 16 RO	5/93 9 RO 3 SRO	12/7/92 8 RO 4 UG	3/93 RT	2/93 5 SRO 10 UG	10/92 RO-20
94	8/94 8 SRO	12/93 6 RO 4 UG	6/93 RO-20 6R 2S 2U	5/93 4 RO 4 UG			9/93 8 RO 3 UG	9/93 RO-16	4/93 9 RO 3 UG
94				5/94 4 RO 4 UG	10/94 9 RO 3 SRO	12/93 8 RO 4 UG	9/94 8 RO 3 UG	2/94 8 RO	
94		7/94 16 RO							
94	5/89 12	7/90 16	7/89 12	9/89 12	4/89 5	1/90 20	5/90 28	9/89 12	
91	8/91 19		6/91 20					9/91 16	10/90 22
92		7/92 16		11/91 12	10/91 12	12/91 12	3/92 28		9/1 8/91 12
93	8/93 20		6/93 20					9/93 12	10/92 16
94		7/94 12		11/93 16	10/93 16	12/93 12	5/94 28		
95	8/95 20		6/95 20					9/95 12	10/94 16
96		7/96 12		11/95 16	10/95 12	12/95 12	3/96 28		

Omaha Public Power District

-2-

bcc w/enclosures:

bcc to distrib. by RIV:

R. D. Martin, RA

RIV File

E. Himes

W. Walker, NRR Project Manager (MS: 11-D-23)

Licensee & Debt Collection Branch, ATTN: Lean Tremper

bcc to DMB (IE42)

Chief Examiner

Chief Examiner Reading File

Section chief (DRP/C)

DRS (J. L. Pellet)

L. Miller, TTC