

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-285/84-09

License: DPR-40

Docket: 50-285

Licensee: Omaha Public Power District (OPPD)
1623 Harney Street
Omaha, Nebraska 68102

Facility Name: Fort Calhoun Station

Inspection At: Fort Calhoun Station, Blair, Nebraska

Inspection Conducted: April 16-19, 1984

Inspector: Blaine Murray 5/9/84
for J. Blair Nicholas, Radiation Specialist Date

Approved: Blaine Murray 5/9/84
Blaine Murray, Chief, Facilities Radiation Date
Protection Section

W.D. W. D. Johnson 5/15/84
W. D. Johnson, Chief, Reactor Project Section A Date

Inspection Summary

Inspection Conducted April 16-19, 1984 (Report 50-285/84-09)

Areas Inspected: Routine, unannounced inspection of the licensee's quality assurance (QA) administration program, records management program, and licensee actions on previously identified inspection findings. The inspection involved 31 inspector-hours onsite by one NRC inspector.

Results: Within the two areas inspected, no violations or deviations were identified.

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DETAILS1. Persons ContactedOPPD

- *W. C. Jones, Division Manager, Production Operations
- *W. G. Gates, Manager, Fort Calhoun Station
- J. E. Bentzinger, Supervisor, Procurement QA
- *C. J. Brunnert, Supervisor, Operations QA
- *J. J. Fisicaro, Supervisor, Nuclear Regulatory Industry Affairs
- *J. M. Gloschen, Manager, Records Management
- *M. E. Kallman, Supervisor, Administrative Services and Security
- F. Kenon, Supervisor, Micrographics
- T. Lawrenson, Records Manager, Fort Calhoun Station
- *K. J. Morris, Manager, Administrative Services
- D. R. Podoll, Manager, Office Systems
- B. Stattler, Records Administrator
- *P. M. Surber, Section Manager, Generating Station Engineering
- *F. A. Thurtell, Division Manager, QA and Regulatory Affairs

Others

- *L. A. Yandell, Senior NRC Resident Inspector

*Denotes those present during the exit briefing on April 19, 1984.

2. Licensee Action on Previous Inspection Findings

(Closed) Violation (285/8116-01): Failure to Meet Record Retention Requirements - This violation involved the requirement to modify the licensee's QA records file room to meet ANSI N45.2.9-1974 standards and the lack of availability and retention of QA records. The NRC inspector reviewed the licensee's actions to modify and upgrade the QA records file room and found them satisfactory to resolve the NRC concerns and bring the records file room in compliance with ANSI N45.2.9-1974 standards. The NRC inspector reviewed the availability and retention of QA records by the licensee and found the licensee's actions satisfactory to close the records program findings described in the violation, except for the retention of construction records which will still remain as another open violation (285/8317-01). Violation 285/8116-01 is considered closed.

(Closed) Violation (285/8116-02): Failure to Retain Records Required by Technical Specifications - This violation involved the lack of retention and ability to retrieve records of radiation exposure for all individuals entering radiation control areas, and records of gaseous radioactive material released to the environs. The NRC inspector reviewed the licensee's actions to resolve this violation and verified that the licensee had found the pencil dosimeter logs (Form FC-229) for 1973, the film badge/TLD reports for prior to December 1973, and the waste gas releases quarterly Technical Specifications (Form FC-252) for 1974 and had indexed and microfilmed these records in accordance with Standing Order C-2. This violation is considered closed.

3. Quality Assurance Administration Program

The NRC inspector reviewed the licensee's QA administrative program to determine compliance with 10 CFR Part 50, Appendix B, requirements and the licensee's QA Manual commitments.

The NRC inspector verified that the licensee had clearly defined and identified those structures, systems, components, documents, and activities which were to be covered by the QA program in the QA Manual, Revision 4, November 1983, and Appendix A of the Updated Safety Analysis Report. The licensee had established procedures and responsibilities in Sections 3.3 and 7 of the QA Manual for making changes to the documents identified in the QA program. The licensee had established administrative controls for QA department procedures (QADPs) in QADP-1, "Control of the Quality Assurance Department Manual," Revision 2, November 1983. Section 3.1.4 provides for the review and approval of QADPs prior to implementation; Section 3.4 provides the method for changes and revisions to the QADPs; and Section 3.3.2 provides methods and controls for distribution and recall of all controlled copies of the QADPs. The NRC inspector verified that a list of control copies of the QADPs was maintained and controlled in the corporate QA files.

The NRC inspector verified that responsibilities and methods had been established by the licensee to ensure overall review of the effectiveness of the QA program. The responsibility had been assigned to the Safety Audit and Review Committee (SARC) in its charter, Revision 6, February 1984. Section III of the SARC charter requires that the performance of those activities required by the QA program to meet the criteria of 10 CFR Part 50, Appendix B, be audited and reviewed at least once per 2 years and that the status and adequacy of the QA program be evaluated also. The NRC inspector reviewed the SARC audit reports performed in 1981 and 1983 for adequate scope and depth to ensure thoroughness of QA program evaluation. The NRC inspector found that the audit procedures and audit checklists appeared to be adequate and that responses and corrective actions to audit findings had been completed and documented in a timely manner.

No violations or deviations were identified.

4. Records Management Program

The NRC inspector reviewed the licensee's records management program to determine compliance with 10 CFR Part 50, Appendix B, requirements; ANSI N45.2.9-1974; and licensee Technical Specifications, Section 5.10.

a. Records to be Maintained

The NRC inspector verified that the licensee had established and implemented a records management program to control QA records required by 10 CFR Part 50, Appendix B, and the Technical Specifications. The licensee had in procedures, "Quality Assurance Records," Revision 0, April 1984; Standing Order C-2, "Fort Calhoun Station QA Records," Revision 13, April 1984; and QADP-15, "Control of QA Department Documents and Records," Revision 3, February 1984; assigned the responsibilities to individual department managers in cooperation with the records management department to assure that records identified in 10 CFR Part 50, Appendix B, and the Technical Specifications were being maintained. The licensee was presently assembling construction phase records for retention to meet their commitments of reviewing the Preliminary Safety Analysis Report as to which QA construction records are required to be kept and also determine the status of the QA construction records by May 1, 1984. The licensee had also committed to provide the NRC a list of types of missing construction records by May 30, 1984. The topic of construction records retention was discussed in NRC Inspection Report 50-285/83-17 and was the subject of an NRC Notice of Violation (285/8317-01) which is still pending resolution.

b. Records Storage

The licensee had upgraded the QA records file room at Fort Calhoun Station to meet the standards committed to in ANSI N45.2.9-1974. The NRC inspector verified that QA records currently being generated and not yet transmitted to the records management department for microfilming were stored in 1-hour rated fire proof filing cabinets located in predesignated departmental office areas throughout the plant and corporate offices. The NRC inspector determined that after a document had been microfilmed one copy of the original film was stored in the lime caverns located near Hutchinson, Kansas, and one complete set of filmed documents was kept in the records management department. Additional complete sets of filmed documents were kept in several locations throughout the licensee's corporate offices and Fort Calhoun Station.

The licensee had developed a procedure designating the custodian(s) in charge of the QA records file room and who maintains complete file libraries of microfilmed QA records. The licensee had

developed and implemented a records management computer filing and retrieval system which with the use of the "Records Management User's Guide" and procedures such as Standing Order C-2 and QADP-15, a user would be able to locate and retrieve any record which had been indexed and microfilmed. The licensee had written a procedure which described the methods used to verify that the records received by the records management department were in agreement with the transmittal document. Upon receipt of a document, the transmittal is verified twice by two individuals and a document verification sheet is completed and attached to the document. The licensee maintains a log out sheet for records accountability of records removed from the QA records file room. This method of accountability is described in Section 3.2.1 of QADP-15. The licensee had established a procedure for microfilming supplemental and/or missing records and indexing them separately in conjunction with the original document. The NRC inspector verified that licensee staff positions both within the records management department and at Fort Calhoun Station had been assigned the responsibilities to assure that all record storage controls had been implemented.

c. Record Retention

The NRC inspector verified that the licensee had written procedures establishing retention times for the types of records identified in 10 CFR Part 50, Appendix B, and the Technical Specifications. Standing Order C-2 is the governing procedure for records generated according to the Technical Specifications and designates retention times in accordance with the Technical Specifications and ANSI N45.2.9-1974. The NRC inspector reviewed QADP-15 and found that procedure to designate what QA department records must be kept and what retention times are assigned.

The licensee had established in the records management procedure on procedures control the responsibility for identifying and assigning retention times to records which should be kept for QA purposes but not required by the Final Safety Analysis Report, Technical Specifications, or 10 CFR Part 50 to the individual department managers. This same procedure also delegates the responsibility and authority for disposal of records to the individual department managers. At the time of the inspection, all plant operating QA records were still in their original form and had not been destroyed even though they had been microfilmed.

d. Implementation

The NRC inspector selected over 30 QA records from the index in Standing Order C-2 and verified that they were indexed and microfilmed according to the computerized records management system and maintained in accordance with the licensee's administrative

controls committed to in the licensee's procedures. All the QA records selected for verification were identified on the records index and were readily retrievable from the designated film and frame location. The microfilm libraries were stored in film drawers in various locations throughout Fort Calhoun Station. The NRC inspector verified that QA records which had not been transmitted to the records management department for microfilming were stored properly in 1-hour rated fire proof file cabinets located in predesignated locations in the various department offices in accordance with the licensee's procedures.

The NRC inspector interviewed the records management department personnel and the records manager at Fort Calhoun Station and verified that the personnel responsible for the implementation of the records management system understood the records management system and implementing procedures satisfactorily to ensure compliance with licensee commitments. The NRC inspector toured the QA records file room and various departmental record storage facilities and determined that the facilities met the standards committed to in ANSI N45.2.9-1974.

The NRC inspector verified that Standing Order C-2 included indexing and transmittal for the QA records identified in the Technical Specifications. All Technical Specification QA records were found to be identified in Standing Order C-2 except for the records of environmental qualification of safety-related electrical equipment. The NRC inspector verified that these records were currently being developed and were properly stored in temporary 1-hour rated fire proof file cabinets on the third floor of the licensee's Jones Street office building. The NRC inspector expressed a concern that these records should be identified by procedure and be microfilmed as soon as completed. The licensee has a commitment to complete this environmental qualification by the completion of the 1984 outage and at that time these records would become a part of the plant's QA records requiring permanent retention for the duration of the Facility Operating License. During the exit briefing the licensee committed to include these record into a Technical Services departmental procedure for record retention as required by the licensee's records management department procedure on procedures control and microfilm these records as soon as reasonably achievable. This item will be inspected for completion during future NRC inspections.

The NRC inspector expressed concern as to the implementation of the new records management department procedures. During the exit briefing it was discussed that the records management department should have management approved operating procedures and that the licensee's individual departments which generate QA records must

develop records management procedures which define, control, and store these QA records prior to transmittal to the records management department. These items will be inspected during future NRC inspections.

No violations or deviations were identified.

5. Exit Briefing

The NRC inspector met with the licensee representatives and the NRC resident inspector identified in paragraph 1 of this report at the conclusion of the inspection on April 19, 1984. The NRC inspector summarized the scope and findings of the inspection and discussed the closing of two previous violations.

INSPECTOR'S REPORT
 Office of Inspection and Enforcement

NICHOLAS, J. BLAIR
 REVIEWER

INSPECTORS

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO.	SEQ.	MO.	YR.
OMAHA PUBLIC POWER DIST. FORT CALHOUN STATION	<input checked="" type="checkbox"/> I - INSERT <input type="checkbox"/> M - MODIFY <input type="checkbox"/> D - DELETE <input type="checkbox"/> R - REPLACE	05000285	8409	A		

PERIOD OF INVESTIGATION/INSPECTION						INSPECTION PERFORMED BY		ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IEMC 0530 "Manpower Reporting-Weekly Manpower Reporting" for code)		
FROM			TO							
MO.	DAY	YR.	MO.	DAY	YR.	1 - REGIONAL OFFICE STAFF	OTHER	REGION	DIVISION	BRANCH
04	16	84	04	19	84	<input checked="" type="checkbox"/> 1 - REGIONAL OFFICE STAFF <input type="checkbox"/> 2 - RESIDENT INSPECTOR <input type="checkbox"/> 3 - PERFORMANCE APPRAISAL TEAM		4	B	A

REGIONAL ACTION (Check one box only)		TYPE OF ACTIVITY CONDUCTED (Check one box only)			
<input type="checkbox"/> 1 - NRC FORM 591	<input checked="" type="checkbox"/> 2 - REGIONAL OFFICE LETTER	<input checked="" type="checkbox"/> 02 - SAFETY <input type="checkbox"/> 03 - INCIDENT <input type="checkbox"/> 04 - ENFORCEMENT <input type="checkbox"/> 05 - MGMT. AUDIT	<input type="checkbox"/> 06 - MGMT. VISIT <input type="checkbox"/> 07 - SPECIAL <input type="checkbox"/> 08 - VENDOR <input type="checkbox"/> 09 - MAT. ACCT.	<input type="checkbox"/> 10 - PLANT SEC. <input type="checkbox"/> 11 - INVENT. VER. <input type="checkbox"/> 12 - SHIPMENT/EXPORT <input type="checkbox"/> 13 - IMPORT	<input type="checkbox"/> 14 - INQUIRY <input type="checkbox"/> 15 - INVESTIGATION

INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAIN 2.790 INFORMATION				LETTER OR REPORT TRANSMITTAL DATE					
A	B	C	D	A	B	C	D	A	B	C	D	A	B	C	D	MO.	DAY	YR.	MO.	DAY	YR.
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MODULE INFORMATION														MODULE INFORMATION																												
REC. ORD.	MODULE NUMBER INSP.					PRIORITY	DIRECT INSPEC-TION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REG. FOLLOWUP					REC. ORD.	MODULE NUMBER INSP.					PRIORITY	DIRECT INSPEC-TION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REG. FOLLOWUP																	
	TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER					LEVEL	TYPE	NUMBER	PHASE	MANUAL CHAPTER		PROCEDURE NUMBER	LEVEL	TYPE	NUMBER	PHASE					MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	TYPE	NUMBER	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL									
B	153107103	B				A	0102							B																												
B	153157151	B				A	0108	11010	C					B																												
B	153197101	B				A	0113	11010	C					B																												
B	159127102	B				A	0018			53197101	B			B																												

* CIRCLE SEQUENCE IF VIOLATION OR DEVIATION