

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

October 11, 1995
LIC-95-0183

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 (J. E. Dyer) to OPPD (T. L. Patterson) dated
September 11, 1995

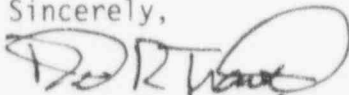
SUBJECT: NRC Inspection Report No. 50-285/95-12, Reply to a Notice of
Violation

The subject report transmitted a Notice of Violation (NOV) resulting from an NRC
inspection conducted July 2 through August 12, 1995 at the Fort Calhoun Station.
Attached is the Omaha Public Power District (OPPD) response to this NOV.

Your comment in the NOV stated "It [the NOV] was also of concern because
maintenance personnel failed to take prompt corrective action when the deficiency
was initially brought to their attention." It is the Fort Calhoun Station (FCS)
management expectation that prompt corrective action is taken anytime a
deficiency is identified. This includes concerns identified by station staff
members as well as those identified by NRC Inspectors.

If you should have any questions, please contact me.

Sincerely,



T. L. Patterson *for*
Division Manager
Nuclear Operations Division

TLP/grc

Attachment

c: Winston and Strawn
L. J. Callan, NRC Regional Administrator, Region IV
S. D. Bloom, NRC Project Manager
W. C. Walker, NRC Senior Resident Inspector

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REPLY TO A NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
License: DPR-40

During an NRC inspection conducted on July 2 through August 12, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (60 FR 34381; June 30, 1995), the violation is listed below:

Technical Specification (TS) 5.8.1 states, in part, that written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the minimum requirements of Regulatory Guide 1.33.

Regulatory Guide 1.33, Appendix A, Section 9.a, states, in part, that maintenance that can affect the performance of safety-related equipment shall be performed in accordance with written procedures or documented instructions appropriate to the circumstances.

Construction Work Order 95-175, Step 2.7, states, in part, that all open piping systems are to be covered during periods of inactivity to preclude the introduction of foreign materials into the system.

Standing Order SO-M-103, "System Cleanliness," Revision 2, Section 7.2.2, states, in part, that system openings shall be covered when work activity is not actively in progress in the vicinity of the opening.

Contrary to the above, the inspectors observed that maintenance personnel did not cover the open piping of a control room air conditioner during a period of inactivity.

This is a Severity Level IV Violation (285/9512-01) (Supplement I).

OPPD Response

A. The Reason for the Violation

This violation occurred during the installation of new piping components in the oil bypass line from the freon compressor for VA-46B. This

installation was included under Modification Request MR-FC-94-020, "VA-46A/B Improved Reliability". The portion of the system involved in this violation is designated as safety related.

The individuals associated with this action had received formal training on Standing Order (SO) SO-M-103 under "Conduct of Maintenance" training sessions. In this training, the contractor steam fitter mechanics were provided instruction on cleanliness requirements identified in SO-M-103. Additionally, the system cleanliness requirements were noted in a specific installation step in the Construction Work Order (CWO), 95-0175, which had been prepared for this job.

The OPPD Manager responsible for the contractor personnel involved in the modification and the supervisor of the contract steam fitter mechanics completed an evaluation of this event. The evaluation results concluded that this event resulted from a lack of attention-to-detail by OPPD Construction Management personnel and the contractor steam fitter mechanics. In Section 7.2.2, SO-M-103 states, "System openings shall be covered when work is not actively in progress in the vicinity of the opening." This violation occurred when the contractor steam fitter mechanics left the work area to secure additional components.

A contributing cause of this event was that SO-M-103 did not clearly delineate when it was acceptable to leave the system open. The procedure did not state what would constitute when work is ". . . not actively in progress in the vicinity of the opening." As a result, the procedural requirement was perceived to be ambiguous and subject to misinterpretation.

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

1. Contractor steam fitter mechanics were presented a training session on July 19, 1995. This training session was provided to ensure that the contractor steam fitter mechanics clearly understood OPPD management expectations concerning SO-M-103. The contractors were briefed on the following:

- Procedural compliance. The training reiterated that when other procedures are referenced, even if not specifically noted on a particular step within the procedure, they still apply (i. e. SO-M-103).
- OPPD management expectations related to the covering of open

systems during periods of inactivity. The term when work is ". . . not actively in progress in the vicinity of the opening" was specifically defined to indicate that whenever the work area is left unattended, the system must be covered.

2. An additional training session was completed for Nuclear Construction Management Department Field/Testing Engineers, contractor steam fitter mechanics supervision and contractor steam fitter mechanics on October 6, 1995. This training highlighted the following:

- Affirmation of OPPD Management expectations regarding self-checking and attention-to-detail when performing work.
- Review of the proposed revision to S0-M-103.

3. Standing Order S0-M-103, Step 7.2.2, was revised to clearly describe conditions that are unacceptable for leaving the system open. This procedure change was approved on October 10, 1995.

C. Corrective Steps Which Will be Taken to Avoid Further Violations

1. A brief synopsis of this event, lessons learned and management expectations of site personnel will be distributed to FCS personnel (except for administrative personnel) via a supervisory briefing Training "Hotline." The Hotline will discuss management expectations concerning cleanliness requirements detailed in S0-M-103. In addition, the importance of responsiveness to identified concerns, attention-to-detail, verbatim compliance to procedures and quality workmanship will be outlined. This Hotline will be issued by October 27, 1995.
2. This event will be added to the Industry Events portion of the Conduct of Maintenance Training. This training will be presented to Nuclear Construction Management (CM) craft and supervision, Fort Calhoun Station (FCS) maintenance personnel, OPPD (non-FCS) maintenance personnel and non-FCS utility maintenance personnel (craft and supervision). This training will be added to the Conduct of Maintenance Lesson Plan by May 31, 1996.

D. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.