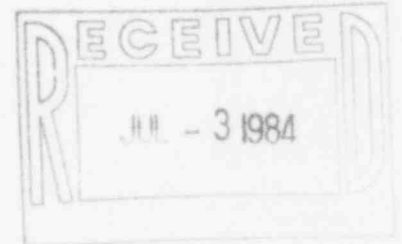


**Omaha Public Power District**  
1623 Harney Omaha, Nebraska 68102  
402/536-4000

June 29, 1984  
LIC-84-206



Mr. Richard P. Denise, Director  
Division of Resident, Reactor Project and  
Engineering Programs  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Denise:

Notice of Violation  
Inspection Report 84-10

The subject inspection report, dated May 30, 1984, identified a violation concerning failure to have procedures for identifying safety-related equipment. Accordingly, please find attached the Omaha Public Power District's response to this Notice of Violation.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. C. Jones".

W. C. Jones  
Division Manager  
Production Operations

WCJ/DJM/rh-B

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

Mr. E. G. Tourigny, Project Manager

Mr. L. A. Yandell, Senior Resident Inspector

E408100062 840807  
PDR ADOCK 05000285  
Q PDR

## ATTACHMENT

Based on the results of an NRC inspection conducted during the period of April 30 through May 4, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8587, dated March 8, 1984, the following violation was identified:

### Failure To Have Procedures For Identifying Safety-Related Equipment

10 CFR Part 50, Appendix B, Criterion V, states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances."

Contrary to the above, the licensee did not have procedures to assure that quality control, maintenance, and other Fort Calhoun Station personnel were provided with, and used, lists of safety-related equipment and components which were up to date, reflecting the current as-built condition of the plant for determination of the quality levels of replacement parts and required inspection of maintenance work, or a document control system to assure use of the latest approved lists.

This is a Severity Level V Violation. (Supplement I.E.)  
(285/8410-03)

### Response

#### (1) The Corrective Steps Which Have Been Taken and the Results Achieved.

A mechanical and structural CQE (Critical Quality Element) list does exist and a draft electrical CQE list was issued for comments in 1982. Although never officially issued, and not yet a controlled document, efforts within the last year have been made to update, revise, and officially issue the combined electrical/mechanical/structural CQE list. Final drafts have been produced and are undergoing departmental reviews in the District's Generating Station Engineering Division at this time. Controlled copies of this document will be available to be issued by July 15, 1984. The distribution of this list will assure that appropriate personnel are provided with controlled lists of safety-related equipment and components.

#### (2) Corrective Steps Which Will Be Taken to Avoid Further Violations.

A controlled document, "Fort Calhoun Station - Unit No. 1 Critical Quality Equipment List," will be issued by July 15, 1984. Incorporated in this list are guidelines for its use, criteria for procurement and replacement of new and used CQE equipment, and guidelines for review and updating of the list. Additionally, by the stated July 15 date, GSE Procedure B-12, "Critical Quality Element (CQE) List Control," will be revised and expanded to provide more complete information regarding the use and revision responsibilities of the CQE list.

In order to ensure that personnel involved with procurement, installation and maintenance of CQE elements have the latest revision of the CQE list available to them, adequate distribution of controlled copies will be made to appropriate personnel.

Although no formal training program is, at this time, deemed necessary, a transmittal letter accompanying the CQE list will provide information necessary concerning the use, application, and procedures associated with the CQE list.

After issuance of the controlled CQE list, the Fort Calhoun Station Operating Manual will be updated to reflect location, content and use of the list.

(3) The Date When Full Compliance Will Be Achieved.

The District will be in full compliance upon implementation of the corrective actions described above by July 31, 1984.