

APPENDIX A

NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
License: DPR-40

During an NRC inspection conducted March 23-27, 1992, violations of NRC requirements were identified. These violations involved failure to follow procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are 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.

- A. Regulatory Guide 1.33, Appendix A, Section 7.e.(1) states, in part, that access control to radiation areas by a radiation work permit system should be covered by written procedures.

Radiation Protection Administrative Procedure RP-AD-200, Section 4.6, states, in part, that radiation protection technicians are responsible for . . . ensuring that RWP requirements are complied with.

Contrary to the above, the licensee identified that on February 28, 1992, a radiation protection technician instructed personnel to work without respiratory protection on Radiation Work Permit (RWP) 92-2538, even though the RWP stated that respiratory protection was required.

This is a Severity Level IV violation (Supplement IV) (285/9207-01).

- B. Regulatory Guide 1.33, Appendix A, Section 7.e.(4) states, in part, that contamination control should be covered by written procedures.

Radiation Protection Procedure RP-207, Section 7.4.B., states, in part, that all personnel skin and/or clothing contamination events not attributed to noble gases and/or naturally occurring radionuclides shall be documented on Form FC-RP-207-1, "Personnel Contamination Report."

Contrary to the above, the licensee identified that on February 28, 1992, three individuals had facial contamination that was not attributed to noble gases and/or naturally occurring radionuclides and the contaminations were not documented on Form FC-RP-207-1.

This is a Severity Level V violation (Supplement IV) (285/9207-02).

C. Regulatory Guide 1.33, Appendix A, Section 7.e.(5) states, in part, that respiratory protection should be covered by written procedures.

1. Radiation Protection Procedure, RP-201, Section 7.4.1.A., states, in part, that respiratory protection equipment selection is to be documented on Form FC-RP-201-6 and attached to the RWP when respiratory protection equipment is specified on a RWP.

Contrary to the above, on March 27, 1992, the inspectors determined that Form FC-RP-201-6 was not attached to RWP 92-2538 which required respiratory protection equipment.

This is a Severity Level V violation (Supplement IV) (285/9207-03).

2. Radiation Protection Procedure RP-203, Section 7.1.2.B., states, in part, that job coverage air samples shall be taken as directed by the RWP during work requiring respiratory protection.

Contrary to the above, the licensee identified that on February 28, 1992, that no air sample was taken to support RWP 92-2538 work which required respiratory protection.

This is a Severity Level IV violation (Supplement IV) (285/9207-04).

D. Regulatory Guide 1.33, Appendix A, Section 7.e.(8) states, in part, that the bioassay program should be covered by written procedures.

Radiation Protection Procedure RP-207, Section 7.4.3.A. states, in part, that whole body counts are required for individuals with skin contamination in the area of the mouth or nose measured prior to decontamination.

Contrary to the above, the licensee identified that on February 28, 1992, three individuals alarmed the personnel contamination monitor and exhibited contamination in the area of the mouth or nose, but a whole body count was not performed.

This is a Severity Level IV violation (Supplement IV) (285/9207-05)

E. Regulatory Guide 1.33, Appendix A, Section 8.b.(1)(aa) states, in part, that specific procedures for surveillance tests, inspections, and calibrations should be written for area, portable, and airborne radiation monitors.

Radiation Protection Procedure RP-402, Section 7.2.3 A. states, in part, that when in service, instruments shall be calibrated at least semiannually. Section 7.2.4 B. states, in part, that schedules may be adjusted + or - 25 percent To extend a calibration due date

attach a second calibration label to the instrument which reflects the new due date.

Contrary to the above, on March 24, 1992, the inspectors noted that the calibration sticker on PING-1A, S/N 212, stated that the calibration was performed on September 12, 1991, and was due on March 12, 1992.

This is a Severity Level IV violation (Supplement IV) (285/9207-06).

Pursuant to the provisions of 10 CFR 2.201, Omaha Public Power District is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified by this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
This 17th day of April 1992