

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

December 22, 1995
LIC-95-0236

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555


References: 1. Docket No. 50-285
2. Letter from NRC (J. E. Dyer) to OPPD (T.L. Patterson) dated
November 22, 1995.

SUBJECT: NRC Inspection Report No. 50-285/95-19, Reply to a Notice of
Violation

The subject report transmitted a Notice of Violation (NOV) resulting from an
NRC inspection conducted September 24, 1995 through November 4, 1995, at the
Fort Calhoun Station. Attached is the Omaha Public Power District (OPPD)
response to this NOV.

If you should have any questions, please contact me.

Sincerely,



T. L. Patterson
Division Manager
Nuclear Operations Division

TLP/epm

Attachment

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

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NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
License: DPR-40

During an NRC inspection conducted on September 24 through November 4, 1995, two examples of 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:

Criterion V of Appendix B to 10 CFR Part 50 and the Fort Calhoun Quality Assurance Plan, Revision 4, Section 2.1, Paragraph 4.2.1, states, in part, that activities affecting quality shall be prescribed by documented instructions and procedures and shall be accomplished in accordance with these instructions or procedures.

Standing Order SO-M-100, Step 6.5.3.B, Revision 23, "Conduct of Maintenance," requires, in part, that all work being performed shall be authorized by an approved work document which is maintained at the work location. Two examples of a violation of this requirement were identified by the NRC.

- A. Contrary to the above, on October 6, 1995, the inspectors observed maintenance personnel perform work on the 4160 volt lighting breaker without having the work documentation at the work location.
- B. Contrary to the above, on October 12, 1995, the inspectors observed maintenance personnel perform work on Containment Spray Pump SI-3C without having the work documentation at the work location.

This is a Severity Level IV violation (285/9519-01) (Supplement I).

OPPD Response

A. The Reason for the Violation

The violation occurred because of a lack of attention to detail by the craft personnel performing the work. In example A., the 4160 volt lighting circuit breaker, the craft personnel did not consider the work to be a maintenance activity since racking the breaker up was a routine operational activity. The craft supervisor at the site of the activity knew that the work procedures were not at the work location, but, did

not think that the activity being performed was maintenance. Most circuit breaker racking, either in or out, is done under the direct control of control room personnel and does not require work instructions for the craft personnel involved since control room personnel are controlling the procedure. The maintenance personnel involved erred in making these assumptions instead of checking the situation out to ensure that the work was being done correctly.

In example B., the Containment Spray Pump (SI-3C) maintenance, craft personnel did not think that the work document was necessary at the job site since the work activity was a routine skill-of-the craft activity. This event occurred even though craft personnel had been briefed prior to the event on the need to have the work document at the job site.

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

1. Management expectations regarding the use of Maintenance Work Documents were conveyed to the personnel involved in these incidents.
2. A separate meeting was held with maintenance crew leaders and supervisors to discuss management expectations regarding procedural compliance and the requirement to have a Maintenance Work Document at the job site.
3. Quality Control and Quality Assurance personnel have been assigned to perform additional surveillance of maintenance work activities to verify compliance with administrative procedures, maintenance procedures and the detailed work instructions provided with maintenance work documents. This action will continue until Condition Report trending has shown a sustained improvement in performance.
4. As part of the implementation of revisions to the maintenance work control process, craft personnel have been trained on the expectation to have the maintenance work document at the job site when performing work.

C. Corrective Steps Which Will Be Take

1. A supervisor briefing will be held with Fort Calhoun Station Maintenance personnel regarding management expectations for the use of procedures and maintenance work documents. These briefings

will be completed by January 12, 1996.

2. Station administrative procedures will be revised to provide additional guidance regarding the use of procedures as continuous use, reference use or information use. This guidance had been previously provided for procedures used by the operations department personnel, but, has not yet been provided for maintenance procedures. These procedures will be revised by March 1, 1996.

D. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.