

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

February 9, 1996
LIC-96-0013

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
January 11, 1996

SUBJECT: NRC Inspection Report No. 50-285/95-21, Reply to a Notice of
Violation

The subject report transmitted a Notice of Violation (NOV) resulting from an
NRC inspection conducted November 5 through December 16, 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

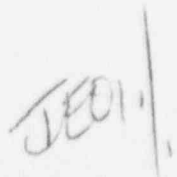
TLP/epm

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 November 5 through December 16, 1995, one 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, state, in part, that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

Standing Order SO-G-91, "Control and Transportation of Combustible Materials" Revision 5, Step 6.2.1.A, requires, in part, that combustibles that are temporarily retained to support an ongoing work activity be minimized and should be limited to 5 gallons of Class B Material (oil).

Contrary to the above, on November 9, 1995, the inspectors identified that a 55 gallon drum filled with lubricating oil had been left unattended inside the east switchgear room while maintenance personnel had gone on break. The drum had been placed there to add lubricating oil to Diesel Generator 1 following a surveillance run.

This is a Severity Level IV violation (285/9521-02) (Supplement I).

OPPD Response

A. The Reason for the Violation

This violation occurred during a routine maintenance activity on Diesel Generator (DG) number 1 under Preventative Maintenance Work Order (PMO) 9507775. The lubricating oil that was inappropriately left in the switchgear room was being used to replace oil that was being removed from the diesel. Craft personnel performing the changeout did not recognize the relationship of their activity to Standing Order (S.O.) G-91 "Control and Transportation of Combustible Materials."

The Fire Protection Process Enhancement Plant Implementation Team (FP-PEP), which is a self-directed team composed of working level representatives from Operations, Maintenance, Training, Security, and Engineering evaluated this incident using a "forced field" analysis and concluded that this event occurred due to inadequate implementation and understanding of the transient combustible procedural requirements. Contributing causes included the manner in which procedure, S.O. G-91, was written and coordinated with other plant procedures.

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

1. The barrel of oil was immediately removed from the area.
2. Craft personnel were made aware of the requirements of S.O. G-91 through morning work group briefings of the mechanical and electrical maintenance crafts. These briefings were conducted by Maintenance representatives to the FP-PEP.
3. The FP-PEP investigated this issue and recommended several actions as delineated in this section as well as section C. of this response.
4. To reduce the number of requests which need to be processed for relief from the requirements of the transient combustible procedures a reevaluation of the acceptable volume of transient combustible liquids and resulting impact on the Fire Hazards Analysis was initiated by System Engineering via EAR-96-003.
5. In addition to the above FP-PEP actions, the Manager of Maintenance has taken the following actions to address procedural non-compliance issues:
 - a. A memorandum was issued to the crafts and was discussed in shop meetings. This memorandum stressed procedural compliance.
 - b. The need for procedure compliance was discussed at the Quarterly Maintenance Conferences conducted in the fourth quarter of 1995. All maintenance department personnel attended these conferences.
 - c. Maintenance crew leaders have been directed to assure that Maintenance Work Documents, are adequate in scope for the work to be done.
 - d. Additional QA/QC observations of maintenance activities are being conducted.

C. Corrective Steps Which Will Be Taken

1. S.O. G-91 has been reviewed and revision 7 to the procedure will be issued no later than April 1, 1996. The revision will include the following enhancements:
 - a. The procedure will be reformatted and rearranged to make it more user-friendly and easier to understand.
 - b. References to other procedures for additional requirements will be eliminated. All requirements from other procedures will now be contained within this procedure.
 - c. Procedural requirements will be clarified where necessary.
2. Training on the revised S.O. G-91 procedure is planned for all Maintenance Department personnel. This training will be completed by June 28, 1996. Other departments, including operations, which may perform field activities related to transient combustibles, will be appropriately trained to assure transient combustible requirements are properly carried out and understood. This phase of the training will be completed by August 30, 1996.

D. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.