

APPENDIX A

Notice of Violation

Omaha Public Power District  
Fort Calhoun Station, Unit 1

Docket: 50-285/84-12  
License: DPR-40

Based on the results of an NRC inspection conducted during the period of May 7-11, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583, dated March 8, 1984, the following violations were identified:

1. Equipment Control

Technical Specification 5.8.1 states, "Written procedures and administrative policies shall be established, implemented, and maintained that meet or exceed the minimum requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972."

ANSI N18.7-1972, Section 5.1.5, states, "Procedures shall be provided for control of equipment, as necessary, to maintain reactor and personnel safety and to avoid unauthorized operation of equipment. These procedures shall require control measures such as locking or tagging to secure and identify equipment in a controlled status. The procedures shall require independent verification, where appropriate, to ensure that necessary measures, such as tagging equipment, have been implemented correctly."

Contrary to the above, the licensee's procedures did not require independent verification of tagouts to ensure that equipment was properly isolated. Standing Order 0-20, Equipment Tagging Procedure, Revision 13, required the craftsman to verify that the equipment was properly isolated. This verification could take the form of at least one of the following: contacting the operator responsible for the tagout to ensure that he had completed the tagout; personally checking the adequacy of the component tagout to ensure that it was safe for maintenance to proceed; or personally verifying that tags had been hung in accordance with the tagout sheet and that the tagged components were in their required position. Interviews with licensee management indicated that the first two options were regularly used. The third option was used only when the craftsman wanted to ensure his own personal safety but was not procedurally required.

This is a Severity Level IV Violation. (Supplement I) (285/8412-01)

2. Quality Assurance Records

10 CFR 50, Appendix B, Section XVII, states that sufficient records shall be maintained to furnish evidence of activities affecting quality and that these records shall include the results of reviews.

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Standing Order G-17, Maintenance Order, Appendix A, Revision 27, Section 4.8.3, stated that whenever Technical Specification applicability was referenced on a maintenance order, approval of these items was to be made by the shift supervisor. This section further stated that if no Technical Specification or redundant equipment was required, an "NA" was to be placed in the approval blank.

Contrary to the above requirements, there was no record of shift supervisor review on the following maintenance orders, all of which involved safety-related equipment and specifically referenced Technical Specification applicability:

<u>Maintenance Order No.</u>	<u>Description</u>
840045	Reset PORV Setpoints
840621	HCV-481 Inoperable
840514	Containment Purge Valves Inoperable

Additionally, an "NA" was recorded in the shift supervisor approval blank for each of the above maintenance orders.

This is a Severity Level IV Violation. (Supplement I) (285/8412-02)

Pursuant to the provisions of 10 CFR 2.201, Omaha Public Power District is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated     AUG 28 1984