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

> August 22, 1984 LIC-84-275

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:

Inspection Report 84-15

The Omaha Public Power District received the Commission's letter dated July 23, 1984 which forwarded a Notice of Violation for Item 285/8415-01, "Failure to Inspect Critical Quality Equipment". Pursuant to 10 CFR 2.201, please find attached the District's response to this Notice of Violation.

Sincerely,

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R. L. Andrews Division Manager Nuclear Production

AUG 2 4 1984

RLA/DJM:rge

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

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MARION

Attachment

Based on the results of an NRC inspection conducted during the period of June 23-27, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 49 FR 8583 (dated March 8, 1984), the following violation was identified:

Failure to Inspect Critical Quality Equipment

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10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions . . . and shall be accomplished in accordance with these instructions, procedures . . ."

Fort Calhoun Quality Assurance Department Procedure 12, Revision 1, dated March 1984, states in Section 3.2.2, "Receiving inspection shall consist of verification of an item's compliance with procurement documents after receipt at Fort Calhoun . . . stores inspection (3.2.3) conducted by a non-certified inspector (stores personnel) shall not replace receiving inspection of generic characteristics affecting quality, which shall be inspected by a certified Level II/III inspector (e.g., cleanliness, packaging, etc.)."

Fort Calhoun Standing Order G-24, "Receiving and Shipping Control of CQE, Limited CQE, Fire Protection Material, and Radioactive Materials Packaging Materials (Quality Material)", Revision 13, dated March 7, 1984, states in Section 3.2.1, "Quality material shipments delivered to the station shall be checked for shipping damage, agreement of actual count with the purchase order and packing slip, and agreement of the individual item identification with the purchase order and packing slip." In addition, Standing Order G-24 states in Section 3.4.1, "Material that has passed receiving (see 3.2.2) shall be inspected and/or tested in accordance with instructions in the Material Acceptance Plan (and any special report forms, when provided)."

Contrary to the above, items ordered under Purchase Orders 52302 and 61106 were received and installed onsite without a receiving or material inspection.

This is a Severity Level V Violation. (Supplement I) (285/8415-01)

District's Response

(1) The corrective steps which have been taken and the results achieved.

Two separate instances were cited in the inspection report. The first: "PO 52302 was completed on September 24, 1982, without benefit of a receiving or materials inspection checklist. PO 52302, dated September 22, 1982, required machine work to be performed on the auxiliary building crane eye hook per SRDCO-FC-82-40. The PO stated final dimensions were to be verified by plant quality control (QC) personnel. The crane eye was reinstalled without benefit of the material inspection which would have caused the final dimensions to be verified by plant QC personnel." The District's investigation has revealed that a documented material inspection was conducted prior to reinstallation of the hook. Although the receiving inspection was performed in accordance with the standing orders, an evaluation has been performed which has enabled the District to take the necessary actions to complete the shipping and receiving packages.

The second instance cited was: "PO 61106, dated October 11, 1983, was a critical quality equipment order for repair of two electronic cards that are required for the QSPDS system. Both cards were delivered at some unspecified date in November, 1983 to the nuclear site and reinstalled without the benefit of a receiving inspection or a materials inspection."

In this instance, the QSPD5 is not part of an operational system. However, the District has completed a proper receipt inspection of the two circuit cards.

A review of the Fort Calhoun Station procedures shows that they are adequate. It appears that both of the above instances were due to lack of knowledge of plant procedures on the part of the individuals involved. The non-compliance with plant procedures has been discussed with the individuals involved.

(2) Corrective steps which will be taken to avoid future violations.

In addition to the investigations conducted, the District will issue a letter by August 31, 1984, to appropriate District personnel involved in the receipt of CQE material to remind them of the necessity of conforming to the standing orders.

(3) The date when full compliance will be achieved.

The District is currently in full compliance.