

Omaha Public Power District
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July 22, 1992
LIC-92-222R

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

References: 1. Docket No. 50-285
2. Letter from NRC (A. B. Beach) to OPPD (W. G. Gates) dated June 22, 1992

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/92-11 Reply to a Notice of Violation (NOV)

The subject report transmitted a NOV resulting from an NRC inspection conducted April 26 through June 6, 1992 at the Fort Calhoun Station (FCS). Attached is the Omaha Public Power District (OPPD) response to this NOV.

In the inspection report, the inspector noted a concern with a lack of a questioning attitude by personnel in the area at the time of discovery of the violation. The FCS plant manager issued a memorandum on June 8, 1992 to all badged personnel stressing the need for a questioning attitude in conducting daily activities. As further action in this effort, OPPD has begun administering self-checking training to the Operations, Maintenance, Chemistry, System Engineering and Radiation Protection Departments at FCS.

If you should have any questions, please contact me.

Sincerely

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

HGR/grc

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Acting Project Manager

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REPLY TO A NOTICE OF VIOLATION

VIOLATION

During an NRC inspection conducted on April 26 through June 6, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion XVI, and the Fort Calhoun Quality Assurance Plan, Revision 3, Section 10.4, Paragraph 4.2.5, require, in part, that corrective actions associated with significant conditions adverse to quality shall preclude repetition.

Contrary to the above, the licensee's corrective action to preclude personnel from walking on critical quality element piping failed to prevent recurrence, when, on May 12, 1992, a member of the licensee's craft personnel was identified stepping on the boric acid storage tank piping while insulating piping in that area.

This is a Severity Level IV violation.

OPPD RESPONSE

A. The Reason for the Violation

This violation resulted primarily from carelessness by a craftsperson. Although fully aware of company policy and limitations for stepping on piping through receipt of a briefing on February 28, 1992 as a result of a similar event, the craftsperson inattentively stepped on the piping.

A contributing factor was also identified. The Fort Calhoun Station (FCS) policies and procedures that contain the limitations for standing and climbing on piping were reviewed. The review revealed some ambiguity and discrepancies among the documents which could result in less than adequate understanding of the limitations by craft personnel. For example, Standing Orders G-21 (Modification Control) and M-100 (Conduct of Maintenance) provided inconsistent guidance on when it was appropriate to stand on piping or cable trays.

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

OPPD completed a Root Cause Analysis (RCA) of this violation. The current policies regarding climbing on piping, conduit, and cable trays have been reviewed with maintenance personnel at department meetings. In addition, the FCS plant manager issued a letter on June 16, 1992 to remove ambiguity in this area until all corrective actions resulting from the RCA could be implemented.

B. Corrective Steps That Have Been Taken and the Results Achieved (Continued)

The individual who stepped on the pipe and his direct supervisor have been counseled to emphasize the FCS policy for climbing and standing on piping, and to reinforce the seriousness of their failure to follow FCS policies.

An engineering assessment has also been completed which concluded that the piping associated with this violation was not damaged as a result of the incident.

C. Corrective Steps That Will Be Taken to Avoid Further Violations

The following steps will be taken to prevent recurrence of this violation:

1. OPPD will revise the FCS Safety Manual to provide a clear policy for personnel climbing and standing on piping, conduit, and cable trays if other means of support are not practical. For this specific issue, the FCS Safety Manual will become the governing document. This will be completed by September 30, 1992.
2. OPPD will revise Standing Orders M-100 (Conduct of Maintenance), G-21 (Modification Control) and O-1 (Conduct of Operations) to reference direction given in the FCS Safety Manual. This will be completed by September 30, 1992.
3. OPPD will revise Standing G-6 (Housekeeping) and G-78 (Observation Program) to add direction for supervisors to increase their awareness on expectations related to this issue. This will be completed by September 30, 1992.
4. After the documents noted in Actions 1-3 above are revised, the Training Department will issue required reading "Hotlines" summarizing this information to personnel whose specific work assignments include working around piping, conduit, and cable trays. This will be completed by October 15, 1992. Also, followup training will be provided to appropriate personnel. This training, which will reinforce management expectations concerning this issue, will be completed by December 31, 1992.
5. Station policy for climbing and standing on piping, conduit, and cable trays will be incorporated into General Employee Training. It will also be incorporated into appropriate continuing training programs. Appropriate lesson plans will be revised by December 31, 1992.

D. Date When Full Compliance Will Be Achieved

OPPD is presently in full compliance based on the completed actions listed above.