



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INVESTIGATIONS FIELD OFFICE, REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

APPENDIX

REPORT OF INVESTIGATION

TITLE: OMAHA PUBLIC POWER DISTRICT/POTENTIAL MATERIAL FALSE STATEMENT
TO THE US NUCLEAR REGULATORY COMMISSION RE: IE BULLETIN 82-02

SUPPLEMENTAL: Docket Number 50-285/84-12

CASE NUMBER: 4-84-031

DATE: November 9, 1984

REPORTING OFFICE: Office of Investigations
Field Office, Region 4 (OI:R4)

STATUS: CLOSED

PERIOD OF INVESTIGATION: June 25, 1984 through July 24, 1984

REPORTING INVESTIGATOR:

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SYNOPSIS

On June 2, 1982, the Nuclear Regulatory Commission's Office of Inspection and Enforcement issued IE Bulletin No. 82-02 to all operating licensed pressurized water nuclear power reactor facilities. The Bulletin's Action Item 3, which required a licensee response within 60 days, requested the licensee to identify those closures and connections within the scope of the Bulletin where fastener lubricants have been or were being used, to include types and composition of materials used. The Omaha Public Power District (OPPD) responded to Action Item 3 in a letter dated August 2, 1982, stating that "The Fort Calhoun Station approved maintenance procedures call for use of NEVERSIEZE (sic) pure nickel #65 (sic) on all threaded fasteners."

During a routine, unannounced, NRC inspection of the Fort Calhoun Station maintenance program conducted May 7-11, 1984, it was determined that the procedures for certain of the hardware items within the scope of IE Bulletin 82-02 (Action Item 3) called for the use of a lubricant other than Never-Seez lubricant #165. The inspection findings were contrary to the information provided to the NRC in OPPD's August 2, 1982 response to IE Bulletin 82-02.

On June 5, 1984, the NRC Region IV Regional Administrator requested Office of Investigations' (OI) assistance "in following up on the circumstances surrounding the potential material false statement" in the written response made by OPPD to IE Bulletin 82-02.

During investigative interviews, the OPPD person who drafted the response and the OPPD personnel having review responsibility for the response, readily admitted that the response contained inaccurate information. This information concerned the types of lubrications used on closures and connections in the reactor coolant pressure boundary at the Fort Calhoun Station. However, all responsible individuals advised that they did not become aware of the inaccuracy contained in the OPPD response until it was brought to their attention as a result of the NRC inspection in May 1984. The investigative

findings indicate that the false statement made in the response was not willful. The investigation determined that the false statement contained in the OPPD August 2, 1982 response was made due to an inadequate review of documentation, a failure to review the appropriate documentation and a failure to otherwise obtain accurate information from knowledgeable Fort Calhoun Station personnel by the District individual assigned responsibility for the response. The actions of this individual appear to be somewhat mitigated due to his limited nuclear power plant experience. He started his employment with OPPD on June 28, 1982, almost one month after receipt of the Bulletin by OPPD. The response was his first substantive assignment for OPPD and he received little or no supervisory assistance in developing it. Despite upper management's review of the response, as required by OPPD procedures, the false statement went undetected.