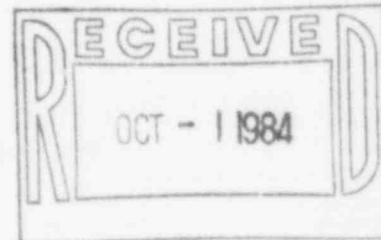


**Omaha Public Power District**  
1623 Harney Omaha, Nebraska 68102  
402/536-4000

September 27, 1984  
LIC-84-329

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:

Notice of Violation  
Inspection Report 84-12

The Omaha Public Power District received the Commission's letter dated August 28, 1984 which forwarded two Notices of Violation: Item 285/8412-01, "Equipment Control," and Item 285/8412-02, "Quality Assurance Records." Pursuant to 10 CFR 2.201, please find attached the District's response to these Notices of Violation.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. L. Andrews".

R. L. Andrews  
Division Manager  
Nuclear Production

RLA/JJF/rh-E

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

Mr. E. G. Tourigny, NRC Project Manager

Mr. L. A. Yandell, Senior Resident Inspector

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PDR ADDOCK 05000285  
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## Attachment

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:

### VIOLATION

#### 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 N18.7-1982."

ANSI N18-7-1982, 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 O-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 1) (285/84-12-01)

### DISTRICT'S RESPONSE

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

Written procedures and administrative policies have been established, are implemented and are being maintained that meet or exceed the minimum requirements of Sections 5.1 and 5.3 of ANSI-N18.7-1972. The District believes that its procedures are adequate, however, additional clarification is necessary.

As noted in the statement of the violation, plant tagging procedures require the craftsman to verify that equipment to be worked on is isolated properly. 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. It should be noted that this procedure is consistent with the general District tagging policy in use at all of the District's power generation facilities and has achieved desired safety results for many years.

Draft changes to the tagging procedure, Standing Order O-20, have been written incorporating various degrees of independent verification to provide the necessary clarification. In addition, a committee comprised of personnel from each of the District's power generation facilities has met to discuss District wide tagging procedures.

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

Plant Standing Orders will be revised, as necessary, to clarify independent verification requirements.

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

The revised procedures will be implemented by January 1, 1985.

VIOLATION

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.

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 1) (285/8412-02)

DISTRICT'S RESPONSE

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

The District believes that the Shift Supervisor did conduct the necessary reviews for Technical Specification applicability in the three (3) instances cited in the inspection report. Each of the three (3) examples cited involved a maintenance order on safety-related equipment, but the Shift Supervisor did not initial the applicable maintenance order to document his review. The existing maintenance order form does not presently provide a means for documenting the Shift Supervisor's review as stated in the Standing Order. In the interim, the Shift Supervisors have been directed to document their review to ensure compliance with the Standing Order.

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

The District will clarify Standing Order G-17 and the maintenance order form to ensure compliance with documentation requirements.

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

Standing Order G-17 and the maintenance order will be revised and implemented by January 1, 1985.