Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

June 22, 1992
LIC-92-195R

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 May 22, 1992

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/92-10 Reply to a Notice of Violation (NOV)

Reference 2 transmitted a NOV resulting from an NRC inspection of the Fort Calhoun Station conducted April 27 through May 1, 1992. As requested, attached is Omaha Public Power District's (OPPD) response. A description of OPPD's program for proceduralizing and maintaining NRC commitments was also requested, and is described below.

Commitments are proceduralized using the guidance of Nuclear Operations Division Quality Procedure, NOD-QP-34, "Ongoing Commitment Program" and Fort Calhoun Station Standing Order (SO) G-30, "Setpoint/Procedure Changes And Generation." Procedure NOD-QP-34, defines an "ongoing commitment" as a commitment detailing a procedural or administrative corrective action or a statement of intended compliance with a specific industry standard. Ongoing commitments involve an action that is performed periodically or continually. A procedure containing an "ongoing" commitment is termed an "Implementing Document," which is a controlled document that establishes a mechanism for maintaining continued compliance with an ongoing commitment. When commitments must be incorporated into a station procedure, SO-G-30 requires that ongoing commitments be identified, annotated and maintained in accordance with NOD-QP-34.

To maintain and control commitments to the NRC and other regulatory agencies, OPPD utilizes a Commitment Tracking System, which is a database residing on a mainframe computer. Commitments in the database can be reviewed using a variety of search methods including keywords, Implementing Documents, etc. Procedure NOD-QP-23, "Commitment Tracking System (CTS) Action Tracking," provides instructions for the assignment and tracking of tasks associated with identified commitments. NOD-QP-23 also includes instructions for the review of documentation justifying task closure.

250030

A001
1/1

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/sel

Attachment

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

REPLY TO A NOTICE OF VIOLATION

VIOLATION

During an NRC inspection conducted on April 27 through May 1, 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:

> Fort Calhoun Technical Specification 5.8, "Procedures," states, in part, that "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 and Appendix A of USNRC Regulatory Guide 1.33," and that, "Each procedure and changes thereto, shall be reviewed by the Plant Review Committee and approved by the Manager - Fort Calhoun Station prior to implementation . . . ."
>
> Contrary to the above, the licensee had failed to maintain procedures for the containment sump narrow range water level instruments, LT-599 and LT-600, which include the Technical Specification requirement of calibration of these instruments by "known signals applied to the sensors."

This is a Severity Level IV violation (285/9210-01) (Supplement 1).

OPPD Response

The Reason for the Violation

As documented in NRC Inspection Report 50-285/90-01, a similar NOV on failure to calibrate the containment sump narrow range water level instrument LT-599 and LT-600 sensors with "known signals . . ." occurred in January 1990. As a result, on February 16, 1990, upgraded procedures IC-ST-WDL-0001 and IC-ST-WDL-0002 were issued. The upgraded procedures required measurement of the float position to verify actual sump water level but did not clearly describe how this was to be accomplished. During surveillance testing in May 1990 using procedures IC-ST-WDL-0001 and IC-ST-WDL-0002, test personnel chose to measure the float position with a ruler to verify actual sump water level. Therefore, during the 1990 Refueling Outage, level instruments LT-599 and LT-600 were calibrated with a "known signal" in accordance with Technical Specification 3.1.

During the 1992 Refueling Outage, changes to IC-ST-WDL-0001 and IC-ST-WDL-0002 were implemented to facilitate performance of the procedures. However, the procedures still did not clearly specify the proper method of measuring the float position, i.e., with a ruler or other physical means. The revised procedures directed the operators and technicians to fill the sump based upon the level indicated on readouts located in the control room. As a result, it was not clear to the technicians that they were to physically measure the water level at the containment sump (i.e., with a ruler); thus, the calibration was performed improperly using control room instruments rather than the method required by Technical Specification 3.1.

Although the potential for noncompliance with Technical Specification 3.1 should have been recognized by the procedure change initiator, the procedure change reviewer and the Plant Review Committee (PRC) also failed to detect it. Finally, the 10 CFR 50.59 review by the Nuclear Safety Review Group (NSRG), (which occurs approximately 30 days after procedures are approved for use by the PRC) did not detect the potential for noncompliance with Technical Specification 3.1.

The Corrective Steps That Have Been Taken And The Results Achieved

1. Procedures IC-ST-WDL-0001 and IC-ST-WDL-0002 were revised to Revisions 11 and 8 respectively on April 29, 1992 to incorporate physical measurement of the containment sump water level. A cautionary statement at the beginning of the section titled "Loop Verification" was added. In accordance with NOD-QP-34, this statement requires review of Commitment Identification (CID) 900061 (include the containment sump narrow range level instrumentation sensors in the calibration process) before revisions are allowed to the "Loop Verification" section. This will insure that the section is not changed or deleted without PRC review and approval.

2. On April 30, 1992, the revised PRC approved procedures were used to calibrate level instruments LT-599 and LT-600 by locally measuring the containment sump water level. The surveillance testing was completed within its Technical Specification required frequency (i.e., refueling outage).

3. A Root Cause Analysis of this event was completed.

The Corrective Steps Which Will Be Taken To Avoid Further Violations

1. A memorandum to all members and alternates on the PRC and NSRG will be issued by July 17, 1992. The memorandum will emphasize the necessity of performing a thorough review of procedure revisions to insure compliance with Technical Specifications.

2. A revision to Procedure NOD-QP-3, "10 CFR 50.59 Safety Evaluations," will be completed by August 31, 1992. The revision will provide additional guidance in determining Technical Specification compliance for the proposed activity.

3. A review of other float type level calibration procedures required by the Technical Specifications will be completed by December 31, 1992. The review will determine if procedure revisions are warranted to clarify the method of calibration required by Technical Specifications.

The Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance. Implementation of the corrective actions noted above will provide additional assurance that this event does not recur.