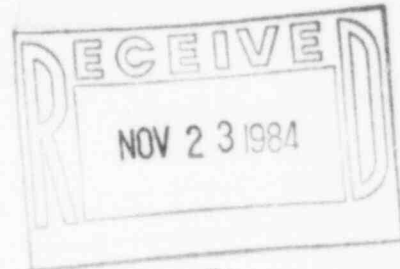


Omaha Public Power District  
1623 Harney Omaha, Nebraska 68102  
402/536-4000

November 20, 1984  
LIC-84-399



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 84-18

The Omaha Public Power District received the Commission's letter dated October 25, 1984 which forwarded two Notices of Violation: Item 285/8418-01, "Failure to provide Authorized Escort," and item 285/8418-02, "Failure to use Current Procedure." Pursuant to 10 CFR 2.201, please find attached the District's response to these Notices of Violation.

Sincerely,

*R. L. Andrews for*

R. L. Andrews  
Division Manager  
Nuclear Production

RLA/JJF/wpc

Attachment

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PDR ADOCK 05000285  
Q PDR

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

## Attachment

Based on the results of an NRC inspection conducted during the period of August 1-September 30, 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

#### Failure to Provide Authorized Escort

Technical Specification 5.8.1 requires that "written procedures . . . be established, implemented, and maintained that meet or exceed the minimum requirements of Sections 5.1 and 5.3 of ANSI 18.7-1972, and Appendix A of USNRC Regulatory Guide 1.33 . . . ."

Standing Order G-7 establishes the Operating Manual and states in Section 1.3 that "adherence to the Operating Manual is mandatory."

Standing Order G-39 provides instructions for proper plant security procedures and states in Section 5.1.4 that "escorted personnel will be escorted by an authorized escort at all times during which they are in the protected area. . . ."

Contrary to the above, on August 14, 1984, the licensee allowed a contractor person requiring a continuous escort to be unescorted in the protected area for approximately 15 minutes.

This is a Severity Level IV Violation. (Supplement III.D.3) (285/8418-01)

### DISTRICT'S RESPONSE

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

The contractor person and the NRC Inspector had just successfully completed General Employee Training. The NRC Inspector and the contractor person were escorted into the protected area for a tour as part of the General Employee Training. Since the unescorted access badge was not immediately available, the contractor person was escorted to meet his Supervisor in an office above the Maintenance Shop. The contractor person went to the office and the escort and the NRC Inspector continued the tour. When they returned, the contractor person was standing in the Maintenance Shop and stated his Supervisor was not in the office. The contractor person was unescorted for approximately fifteen (15) minutes. The error occurred because the escort did not deliver the contractor person directly to the Supervisor in order to pass the escort responsibilities as required by Plant Procedures.

DISTRICT'S RESPONSE (Continued)

The contractor person was then escorted out of the protected area after the incident. The individual who escorted the contractor person was retrained in escort responsibilities immediately after the incident.

The Training Department has conducted a review of the lesson plans for General Employee Training in order to determine if the lesson plans are adequate and based on the results of that review, it has been determined that the lesson plans are adequate and no changes are required.

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

The Training Department will place increased emphasis on the escort duties and responsibilities during General Employee Training.

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

The District is presently in full compliance.

VIOLATION

Failure to Use Current Procedure

Technical Specification 5.8.1 requires that "written procedures . . . be established, implemented, and maintained that meet or exceed the minimum requirements of Sections 5.1 and 5.3 of ANSI 18.7-1972, and Appendix A of USNRC Regulatory Guide 1.33 . . . ."

Standing Order G-7 establishes the Operating Manual and states in Section 2.2 that "it is the responsibility of each individual using a procedure to check the Official Copies . . . to ensure they have the most current revision." Section 2.2.2 states that "a stamp is then placed upon the front of the procedure indicating signature and date to point out that the individual verified and used the latest revision to that procedure."

Contrary to the above, on September 4, 1984, the licensee failed to properly verify and incorrectly used Revision 18 to Surveillance Test ST-RM-1, "Area Monitor," when Revision 19, dated August 7, 1984, had been issued and was available in the Official Copies of the Plant Operating Manual.

This is a Severity Level IV Violation. (Supplement I.D.3) (285/84-18)

## DISTRICT'S RESPONSE

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

Surveillance Test ST-RM-1, F.2 was completed in its entirety on September 4, 1984. On this date, the "master revision" was verified by the technician performing the work as being Revision 18. Review of the surveillance test paperwork revealed that the appropriate surveillance test revision was Revision 19. An Operation Incident Report No. 1996 was written to inform the plant management of the error, to investigate the matter, and to determine what corrective actions were necessary.

Subsequent investigations revealed the following facts:

1. The technician performing the surveillance test revision verification had mistakenly used a copy of the surveillance test obtained from a satellite file to perform the verification instead of from the "master file".
2. An investigation was conducted to determine what the surveillance test differences were between Revision 18 and Revision 19 and to determine the safety impact of performing the incorrect revision of ST-RM-1, F.2. Procedure Change No. 12983 addressed the change which upgraded Surveillance Test ST-RM-1, F.2 from Revision 18 to Revision 19. The content of Procedure Change 12983 involved elimination of all reference to Radiation Monitor RM-083 from the surveillance test. This was due to the fact that Radiation Monitor RM-083 has been removed from service for a period of several years. Per previous surveillance tests, any steps relating to this monitor were merely "N/A'd" as being "Not Applicable". Hence, it was determined that the content of the change did not hamper the performance of the surveillance test in any manner, nor did the change have any adverse safety impact. As such, it was not deemed necessary that Surveillance Test ST-RM-1, F.2 for the month of September be performed again using Revision 19.

The technician involved in this incident, as well as additional technicians who might perform routine monthly surveillance tests, have been retrained on the importance of complying with procedural revision verification requirements that are delineated in plant Standing Order G-7. Verification of this training was documented on the Operation Incident No. 1996.

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

The action previously taken, as described in (1) above, is considered appropriate to prevent a recurrence of the violation.

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

The District is currently in full compliance.