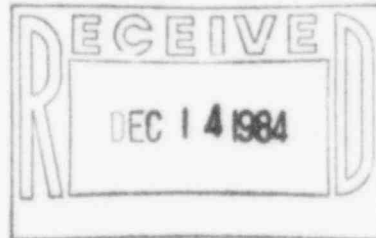


**Omaha Public Power District**  
1623 Harney Omaha, Nebraska 68102  
402/536-4000

December 10, 1984  
LIC-84-419

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 84-21

The Omaha Public Power District received the Commission's letter dated October 25, 1984 which forwarded two Notices of Violation: Item 285/8421-01, "Failure to Follow Procedures," and Item 285/8421-02, "Lack of Adequate Procedures." Pursuant to 10 CFR 2.201, please find attached the District's response to these Notices of Violation.

Sincerely,

*R. L. Andrews*  
R. L. Andrews  
Division Manager  
Nuclear Production

RLA/JJF/dao

Attachment

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

Mr. E. G. Tourigny, NRC Project Manager  
Mr. L. A. Yandell, Senior Resident Inspector

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PDR ADDCK 05000285  
Q PDR

Attachment

Based on the results of an NRC inspection conducted during the period of August 28-31, 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:

1. Failure to Follow Procedures

Criterion V of Appendix B to 10 CFR Part 50 requires, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. . ."

- a. The OPPD Quality Assurance Program Manual, paragraph A.13 states, in part, ". . . When inspection and testing equipment is found to be out of calibration due to use or damage, or when out of limits at recalibration, all items inspected, tested or measured with that equipment since the latest valid calibration shall be considered as being potentially unacceptable. Resolution of those cases shall be determined on a case by case basis treating them as a nonconformance."

FCS Standing Order No. M-28, paragraph 6.8, states, in part, "Any instruments found to be out-of-calibration, or that require repair, shall have a 'Defective/Rejective Test Equipment Analysis Sheet' completed upon recalibration. . ."

Contrary to the above, two secondary standards (I&C#1 and I&C#28) were found to be out of tolerance at calibration and were not identified on a "Defective/Rejected Test Equipment Analysis Sheet" as required and no investigation made to determine the effect of the out of tolerance condition (285/8421-02a).

- b. The OPPD Quality Assurance Program Manual, paragraph A.13 states, in part, "Calibration activities being performed by OPPD personnel are in accordance with Standing Orders."

FCS Standing Order No. M-28, paragraph 5.2, states, in part, "Minimum schedules for performing calibration and certification are established in Appendix A. . ."

Contrary to the above, minimum calibration schedules had not been established in Schedule A for oscilloscopes and electrical current measuring standards as required (285/8421-02b).

This is a Severity Level IV Violation. (Supplement I)

Response

- (1) The corrective steps which have been taken and the results achieved.
  - a. The disposition of the two secondary standards is as follows: A "Defective/Rejected Test Equipment Analysis Sheet" was properly filled out for I&C#1 and I&C#28. The appropriate analyses were performed on the equipment that was calibrated using I&C#1 and I&C#28 to determine the effect of the out of tolerance condition. The results of these analyses indicates that the equipment calibrated with I&C#1 and I&C#28 were within acceptable tolerance, consequently no additional action was taken. By completing the above mentioned forms and performing the necessary analyses it has been verified that the out of tolerance condition is not of safety significance.
  - b. It has been District policy not to use oscilloscopes for calibrating Station instrument loops. In the past, they have been used for troubleshooting only and not to make quantitative measurements. However, the District has, in the recent past, developed calibration procedures for oscilloscopes and has decided to include them in Appendix A. Electrical current measuring standards are included in Appendix A by virtue of the fact that current measuring standards are the same piece of equipment as voltage measuring standards. Appendix A has been changed to clarify the category of test equipment to read "voltage/current measuring equipment". By making the above mentioned changes or clarification to Appendix A has assured that schedules are established for the calibration of oscilloscopes and electrical current measuring standards.
- (2) Corrective steps which will be taken to avoid further violations.
  - a. The procedure governing the disposition and resolution of problems in the measuring and test equipment will be re-written to include comprehensive procedures to be followed when a piece of measuring and test equipment is found to be out of calibration.
  - b. No further action is required.
- (3) The date when full compliance will be achieved.
  - a. The District will be in full compliance by January 31, 1985.
  - b. The District is presently in full compliance.

2. Lack of Adequate Procedures

Criterion V of Appendix B to 10 CFR Part 50 requires, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances. . ."

- a. The OPPD Quality Assurance Program Manual, paragraph A.13 states, in part, ". . . When inspection and testing equipment is found to be out of calibration due to use or damage, or when out of limits at recalibration, all items inspected, tested, or measured with that equipment since the latest valid calibration shall be considered as being potentially unacceptable. Resolution of those cases shall be determined on a case by case basis treating them as a nonconformance."

Contrary to the above, FCS procedures did not provide for the identification of equipment and subsequent resolution of possible nonconformances associated with plant process instrumentation, surveillance test instrumentation, and pressure gauges when found to be out of tolerance at calibration (285/8421-01a).

- b. The OPPD Quality Assurance Program Manual, paragraph A.1 states, in part, "The program is based on . . . the guidance provided in American National Standard, ANSI 45.2 . . . and its associated daughter standards. . ."

ANSI N45.2.1-1973, paragraph 2.2 states, in part, "Cleaning procedures as well as procedures or work instructions for cleanliness control practices and inspections, examinations or test to verify cleanliness of items shall be prepared. . ."

Contrary to the above, procedures had not been prepared to implement the cleaning requirements for fluid systems and associated components (285/8421-01b).

This is a Severity Level V Violation. (Supplement I)

Response

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

- a. The instrument and control group has implemented a test equipment checkout log that provides for tracking of test equipment. The addition of the above mentioned log has provided a mechanism to ensure that when test equipment is found in an out of tolerance condition the necessary review can be done in a timely manner.

- b. At present, cleanliness of safety related systems is ensured by having Quality Control inspectors perform close-out inspection of systems where practical. The close-out inspection requirement is included either on the maintenance order or in the procedure which governs the maintenance or modification activity.

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

- a. The District intends to rewrite the procedure governing the disposition of a piece of test equipment found to be out of calibration. Included in the procedure will be timely notification of appropriate management personnel of a deficiency to ensure prompt corrective action is taken.
- b. The standing orders which govern the maintenance or modification of plant systems will be reviewed and revised as appropriate to formally address the requirements of Quality Assurance Manual Plan 6.3 on Cleanliness Controls.

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

- a. The District will be in full compliance by January 31, 1985.
- b. The review and revision of standing orders will be completed by June 30, 1985.