



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

June 21, 1985  
LIC-85-279

Mr. Dorwin R. Hunter, Chief  
Reactor Project Branch #2  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Reference: Docket No. 50-285

Dear Mr. Hunter:

IE Inspection Report 85-03  
Notice of Violation

The Omaha Public Power District received the subject inspection report dated May 23, 1985. This report forwarded two notices of violation, one for "Failure to Meet Record Retrieval Requirements," and the second for "Failure to have Procedures for Identification of Safety-Related Piping Requiring In Service Inspection ISI." Pursuant to 10 CFR 2.201, please find attached the District's response to these violations.

Sincerely,

R. L. Andrews  
Division Manager  
Nuclear Production

RLA/DJM/dao

Attachments

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, NRC Senior Resident Inspector

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IC-075/85

## ATTACHMENT

Based on the results of an NRC inspection conducted during the period of March 4-8, 1985, 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 Meet Record Retrieval Requirements

10 CFR Part 50, Appendix B, Criterion XVII, states that records shall be identifiable and retrievable and that, consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention such as duration, location, and assigned responsibility. WASH-1283 accepts ANSI N45.2.9 (11th draft, Revision 0, dated January 17, 1973) as being an adequate basis for complying with Criterion XVII.

OPPD's latest approved quality assurance program, transmitted by OPPD letter LIC-83-128, dated June 10, 1983, documents the establishment of requirements to ensure compliance with 10 CFR 50, Appendix B and commitment to WASH-1283.

ANSI N45.2.9, Section 6.2, requires accurate retrieval of information without undue delay.

Contrary to the above, the licensee was unable to retrieve for review by the NRC inspector documents substantiating accomplishment of the thermal stress analysis of safety-related piping below 2½ inch diameter designed to specification USAS B31.7.

This is a Severity Level IV Violation. (Supplement I.D.) (50-285/8503-02)

### District Response

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

Since the time of the inspection, the Omaha Public Power District has made additional attempts and has been unable to retrieve documents substantiating accomplishment of the thermal stress analysis of safety-related piping below 2½ inch diameter designed to Code USAS B31.7, draft February, 1968. The NRC Inspection Report cites Section 700 of B31.7 as requiring the preparation of a stress report for Class I piping. The last sentence of Nuclear Power Piping USAS B31.7, Chapter 1-II, Paragraph 1-702.5 "Stress Analysis" of the above code states that "Other analytical or experimental techniques may be used if they are either more accurate or more conservative than those contained in this code." The District's A/E utilized a nomograph which may represent a more conservative approach. Documentation is available on the conservatism of the nomograph utilized in determining spacing of seismic supports.

Based upon our review, the District has no indication that the actual records necessary to document the performance of a thermal stress analysis still exist, and no further steps will be taken to locate these records.

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

The District will perform an evaluation to determine the safety significance (if any) of the missing records.

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

The District's evaluation will be completed by October 20, 1985.

2. Failure to Have Procedures for Identification of Safety-Related Piping Requiring In Service Inspection (ISI)

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by procedures. Those procedures shall include necessary acceptance criteria to determine that the activities have been satisfactorily accomplished. This requirement is implemented by OPPD's latest approved quality assurance program which documents their policies, and compliance with 10 CFR 50, Appendix B, and WASH-1283, 1284 and 1309.

Contrary to the above, licensee procedures did not prevent the failure to identify for inclusion in the Fort Calhoun Station ISI program the Safety Injection (SI) system 24-inch recirculation piping fabricated on construction contract 770.

This is a Severity Level V Violation. (Supplement I.E.) (50-285/8503-04)

District Response

(1) The Corrective Steps Which Have Been Taken and the Results Achieved.

10 CFR Part 50, Appendix B, Criterion V, states that 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."

The District, in evaluating Fort Calhoun Station systems and equipment for inclusion in the Inservice Inspection Program, utilized the Fort Calhoun Station Piping and Instrumentation Drawings (P&ID's) to define the boundaries of the program. This is stated in Section 1.1, "Scope and Responsibility" of the Omaha Public Power District, Fort Calhoun Station, Unit 1, Inservice Inspection Program Plan for the 1983-1993 Interval. These Piping and Instrumentation Drawings have been drawn showing boundary flags which indicate boundaries of systems as described by 10 CFR 50.55(a) and NRC Regulatory Guide 1.26, "Quality Group Classification and Standard for Water, Steam, and Radioactive Waste Containing Components of Nuclear Power Plants." The development and use of these P&ID's is described in the Omaha Public Power District, Fort Calhoun Station, Unit No. 1, Critical Quality Elements (C.Q.E) List, to which the P&ID's are an attachment. Both the P&ID's and the CQE List are OPPD controlled documents.

District Response (Continued)

10 CFR 50, Appendix B. Criterion V, further states that "Instructions, procedures, or drawings shall include appropriate quantities or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished." After having identified the appropriate "Code classifications" for the piping systems and components, as described above, the appropriate examination requirements were determined based upon the Section XI, ASME Boiler and Pressure Vessel Code, 1980 Edition through Winter of 1980 Addenda. This too is described in the Omaha Public Power District, Fort Calhoun Station Unit 1, Inservice Inspection Program Plan for the 1983-1993 Interval.

It is the District's belief that the inservice inspection program, developed from ASME Section XI, the CQE List, and the P&ID's, meets the requirements of 10 CFR 50, Appendix B. The failure to include the buried portion of the 24" safety injection recirculation line in the examination portion of the ISI program was an oversight. We believe that this oversight was an isolated case and that the existing methods and documents utilized to develop the ISI program are adequate.

Further, an exemption to ASME Boiler and Pressure Vessel Code, Section XI, has been requested for the buried portion of the 24" safety injection recirculation line. The justification for the exemption cites an ASME-approved Code Case N-408. This code case, if accepted by the NRC, would provide an exemption to the ASME Code for piping such as this 24" recirculation piping. The District's request for exemption was submitted in a letter from OPPD (R. L. Andrews) to NRC (Mr. E. J. Butcher) dated June 17, 1985 (LIC-85-217).

(2) Corrective Steps Which Will Be Taken To Avoid Further Violations.

It is the District's belief that actions described in (1) above are adequate to prevent further violations. No additional actions are deemed necessary.

(3) The Date When Full Compliance Will Be Achieved.

The Omaha Public Power District will be in full compliance upon NRC approval of the request for exemption from testing requirements for the buried sections of the 24" recirculation piping or upon NRC approval of ASME B&PV Code Case N-408, whichever occurs first.

*R. L. Andrews*