

APPENDIX A  
NOTICE OF VIOLATION

Omaha Public Power District  
Fort Calhoun Station

Docket: 50-285  
License: DPR-40

During an NRC inspection conducted on August 26-30, 1985, three violations of NRC requirements were identified. The violations involved the inability to perform prompt notifications, inadequate training for personnel assigned to the emergency response organization, and the inadequate review of the Emergency Preparedness Program. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Inadequate Training of Personnel

10 CFR 50.47(b)(15) requires that radiological emergency response training be provided to those who may be called on to assist in an emergency.

10 CFR 50.54(q) and (s)(2)(ii) require that a licensee shall maintain in effect emergency plans which meet the standards of 10 CFR 50.47 and the requirements of 10 CFR 50, Appendix E to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency (including findings based on requirements of Appendix E, Section IV.D.3).

Section E(1.1) of the RERP for the Fort Calhoun Station states that the initial notification of the States of Nebraska and Iowa and local emergency organizations will be made within 15 minutes after plant personnel recognize that events have occurred which make declaration of an emergency class necessary.

Contrary to the above, the staff of three operating shifts were unable to demonstrate the ability to perform 15 minute notifications of state and local authorities.

This is a Severity Level IV violation (Supplement VII.D) (285/8519-01).

B. Inadequate Training of Personnel

10 CFR 50.47(b)(15) requires that radiological emergency response training be provided to those who may be called on to assist in an emergency.

Section O, paragraph 4.0, of the RERP for the Fort Calhoun Station states that initial and recovery emergency response organization personnel must satisfactorily complete a written examination as part of their training.

Contrary to the above, the NRC inspectors found that radiological emergency response training had not been adequately provided as evidenced by the following discrepancies:

- Health physics technicians onshift were unable to perform two main tasks: ascertaining habitability conditions in the control room, and performing release value calculations.
- During scenario walkthroughs, shift personnel were unable to determine population sectors affected by the radioactive plume, containment activity release rates and failed, in some cases to properly classify and downgrade emergency events. Two out of three operating shifts failed to recognize that containment isolation was not identical with zero leakage.
- Emergency preparedness training requirements were nonexistent for shift technical advisors, and senior reactor operators who were not shift supervisors.
- Emergency assignments were made to personnel that had not been trained or qualified.
- Tests given to emergency personnel were not commensurate with the scope and depth of training, and grading of tests was irregular in that quantitatively different answers for the same question were graded as correct.

This is a Severity Level IV violation (Supplement VIII.D) (285/8519-02).

C. Inadequate Review of the Emergency Preparedness Program

10 CFR 50.54(t) requires that all nuclear power reactor licensees perform an independent review of their emergency preparedness program at least every 12 months by persons having no direct responsibilities for its implementation. The review shall include an evaluation of the adequacy of interfaces with states and local governments, and relevant specific results shall be made available to the various parties involved.

Contrary to the above, the NRC inspectors determined that although OPPD audits for the years 1984-85 included the evaluation of interfaces with states and local governments as an objective, reviews were limited to ascertaining whether letters of agreement were current. Moreover, the Safety Audit and Review Committee audit for 1983 failed to include the review of interfaces as an objective.

This is a Severity Level IV violation (Supplement VIII.D) (285/8519-03).

Pursuant to the provisions of 10 CFR 2.201, Omaha Public Power District is hereby required to submit to this office within 30 days of the date of the

letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this 29th day of January, 1986.