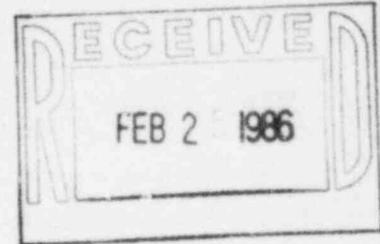


Omaha Public Power District
1623 Harney Omaha, Nebraska 68102-2247
402/536-4000

February 16, 1986
LIC-86-061



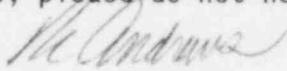
Mr. J. E. Gagliardo, Chief
Reactor Projects Branch
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

References: 1. Docket No. 50-285
2. Inspection Report 50-285/85-27 dated January 17, 1986.

Dear Mr. Gagliardo:

Response to Inspection Report 85-27
Notice of Violation
Notices of Deviation

Omaha Public Power District received reference 2 containing one (1) Notice of Violation concerning the failure of personnel to properly display a badge while inside the protected area. OPPD's response to this Violation is found in Appendix A to this letter. Reference 2 also contained two (2) Notices of Deviation, one regarding failure to meet a commitment relative to the cleanliness of fluid systems, and the other regarding failure to meet a commitment relative to the requirements for temporary critical quality equipment (CQE) storage areas. OPPD's response to these Deviations is found in Appendix B to this letter. If you have any questions concerning any of these responses, please do not hesitate to contact us.


R. L. Andrews
Division Manager
Nuclear Production

RLA/DJM:me

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, NW
Washington, DC 20036

Mr. E. G. Tourigny, NRC Project Manager
Mr. P. H. Harrell, NRC Senior Resident Inspector

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PDR ADOCK 05000285
Q PDR

IC-031/86

APPENDIX A

During an NRC inspection conducted during the period December 1-31, 1985, a violation of NRC requirements was identified. The violation involved the failure to display security badges inside the protected area. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions,": 10 CFR Part 2, Appendix C (1985), the violation is listed below:

Section 73.55(d)(5) of 10 CFR Part 73 states, in part, "Badges shall be displayed by all individuals while inside the protected area."

Standing Order G-39, "Security Instructions," has been established to implement this requirement.

Section 9.1 of Standing Order G-39 states, in part, "All personnel given unescorted access to the protected area will wear a photo identification badge to indicate that classification. The badge will be displayed in plain sight."

Contrary to the above, individuals were observed in the protected area on three different occasions not displaying their security badges.

This is a Severity Level V violation (Supplement I.E) (285/8527-03).

OPPD RESPONSE

(1) The reason for the violation, if admitted.

The violation occurred due to the inattention of those individuals observed not wearing badges.

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

A memorandum dated December 12, 1985, FC-1697-85, from the Acting Supervisor-Administrative Services and Security reminded all badged personnel to continually display badges while in the protected area. Signs reminding personnel of the same need were placed adjacent to the turnstiles in the access lanes of the security building.

A memorandum has been sent to Fort Calhoun Station department heads asking them to direct a reminder of the need to display badges to all employees through their supervisor. Memoranda have been sent to members of the security force reminding them to look for badges and request compliance if the badge is not visible.

(3) The corrective steps which will be taken to avoid further violations.

The corrective steps noted in (2) above are believed adequate to prevent further violations.

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

Fort Calhoun Station personnel are presently in full compliance.

APPENDIX B

Based on the results of an NRC inspection conducted during the period of December 1-31, 1985, and in accordance with NRC Enforcement Policy 10 CFR Part 2, Appendix C (1985), the following deviations were identified:

A. Failure to meet a Commitment Relative to the Cleanliness of Fluid Systems

By a letter dated March 15, 1985, in response to Violation 285/8421-01b, the licensee committed to establishing a program for fluid system cleanliness control. The program was to include revision of appropriate procedures and implementation of the requirements.

In deviation from the above, the licensee failed to make procedure changes and implement all of the requirements of the fluid systems cleanliness program. (285/8527-01).

B. Failure to Meet a Commitment Relative to the Requirements for Temporary Critical Quality Equipment (CQE) Storage Areas

By a letter dated March 28, 1985, in response to Violation 285/8501-01, the licensee committed to maintain temporary CQE storage areas in accordance with the licensee's established procedural requirements.

In deviation from the above, the licensee failed to maintain the temporary CQE storage areas in accordance with the requirements. (285/8527-02)

Omaha Public Power District is hereby requested to submit to this office, within 30 days of the date of the Notice of Deviation, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further deviation from commitments made to the Commission; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

OPPD RESPONSE TO DEVIATION A.

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

In response to Violation 285/8421-01b, the Quality Assurance Plan, Section 6.3, was revised to include paragraph 4.2.2 which states that "Openings or pipe ends shall be capped or sealed as necessary to prevent the introduction of deleterious contaminants except when needed to carry out operation or installation activities."

Standing Orders G-26A and G-21 were also revised to require and reference the cleanliness control program. Cleanliness requirements were also addressed in the appropriate routine maintenance procedures. The need for cleanliness requirements in this special procedure was apparently overlooked by the Quality Control personnel.

OPPD RESPONSE TO DEVIATION A. (Continued)

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

Memorandum FC-171-86 dated February 12, 1986, was sent to Quality Control, Plant Engineering and Maintenance personnel reminding them of the importance of capping or sealing an open system to prevent the introduction of foreign material except when performing operations or installation activities.

- (2) The corrective steps which will be taken to avoid further deviation from commitments made to the Commission.

The actions resulting from the previous commitment (response to violation 285/8421-01b) are considered to be adequate to prevent further violations. The special procedure cited in this deviation was not included in the list of generic maintenance procedures which were revised to include cleanliness control requirements, according to the letter dated March 15, 1985. Quality Control is responsible for reviewing maintenance and modification procedures to ensure that the cleanliness control requirement is implemented, when necessary, according to Standing Order G-26A.

As noted in (1) above, a memorandum has been sent to Quality Control and Engineering personnel in order to emphasize the importance of the cleanliness control program.

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

Fort Calhoun Station personnel are presently in full compliance.

OPPD RESPONSE TO B.

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

Several actions have been undertaken to correct problems associated with temporary CQE storage areas. These include removing temporary CQE storage areas that are no longer needed. Additionally, the areas that are needed have been examined and any anomalies with the area have been corrected and the area returned to compliance with the Station Standing Orders.

- (2) The corrective steps which will be taken to avoid further deviation from commitments made to the Commission.

Since the current method of temporary storage of CQE materials is cumbersome and has the potential for being in non-conformance with the Station Standing Orders, and thus in deviation with NRC commitments, a task force, consisting of four (4) station management representatives

- (2) The corrective steps which will be taken to avoid further deviation from commitments made to the Commission. (continued)

has been established to provide a better solution to the storage of CQE materials. This task force will review the method of temporary CQE storage and additional measures required to ensure compliance with the Station Standing Orders, the Quality Assurance Plan and the ANSI Standard N45.2. This effort and subsequent recommendations are intended to be complete by May 15, 1986. Until final resolution by the committee described above, members of maintenance supervision will, during each working day, inspect each temporary CQE storage area to insure compliance with the Station Standing Orders.

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

OPPD is presently in full compliance.