

APPENDIX A

NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
Operating License: DP-40

During an NRC inspection conducted on November 1-30, 1987, violations of NRC requirements were identified. The violations involved the failure to have an adequate postmaintenance testing program for safety-related components and the failure to issue and implement a procedure for surveillance testing of the core exit thermocouple system. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. Section 5.8.1 of the Technical Specifications states, in part, that written procedures shall be established, implemented, and maintained that meet or exceed the minimum requirements of Section 5.3 of ANSI 18.7-1972.

Section 5.3.5(3) of ANSI 18.7-1972, which is applicable to all safety-related equipment, requires that maintenance procedures provide instructions for postmaintenance checkout and return to service.

Section 6.2 of the licensee's Quality Assurance Plan states, in part, that postmaintenance testing shall be performed on CQE (safety-related), limited-CQE, and fire-protection equipment.

1. Contrary to the above, Procedure SO-G-17 does not require the technical supervisor to specify postmaintenance testing requirements for all CQE, limited-CQE, and fire-protection equipment. Paragraph 4.3 of this procedure requires postmaintenance testing only for safety-related equipment required to function during accident conditions.
2. Contrary to the above, postmaintenance operability testing was not specified on Maintenance Orders 875166, 875167, and 875183 which were issued for repair of safety-related Valves PCV-514A, FCV-532A, and LCV-1173, respectively. These are safety-related valves not required to function during accident conditions.

This is a Severity Level IV violation. (Supplement I)(285/8729-01)

- B. Section 5.8.1 of the Technical Specifications states, in part, that procedures shall be established, implemented, and maintained that meet or exceed the requirements of Appendix A to Regulatory Guide 1.33.

Section 8.b of Appendix A to Regulatory Guide 1.33 states, in part, that specific procedures for surveillance tests should be written for each surveillance test listed in the Technical Specifications.

On October 30, 1987, Amendment 110 of the Technical Specifications became effective and established the surveillance requirements for the core exit and heated junction thermocouple instrumentation systems.

Contrary to the above, the licensee failed to issue and implement procedures for surveillance testing of the core exit and heated junction thermocouple instrumentation systems on October 30, 1987, the date that Amendment 110 became effective. On November 10, 1987, the NRC inspector notified the licensee that surveillance test procedures had not been implemented. On November 24, 1987, the licensee issued the core exit and heated junction thermocouple instrumentation surveillance procedure and performed testing to verify instrumentation operability.

This is a Severity Level IV violation. (Supplement I)(285/8729-04)

Pursuant to the provisions of 10 CFR 2.201, Omaha Public Power District is hereby required to submit a written statement or explanation to this Office within 30 days of the date of the letter transmitting this Notice. This reply, should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that 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 26th day of January 1988