



OPPD

Omaha Public Power District
444 South 16th Street Mall
Omaha NE 68102-2247

July 16, 1997
LIC-97-0106

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Reference: Docket No. 50-285

Subject: Licensee Event Report 97-008 Revision 0 for the Fort Calhoun
Station

Please find attached Licensee Event Report 97-008 Revision 0 dated July
16, 1997. This report is being submitted pursuant to
10CFR50.73(a)(2)(i)(B). If you should have any questions, please
contact me.

Sincerely,

James K. Gambhir

S. K. Gambhir
Division Manager
Engineering & Operation Support

EPM/epm

Attachment

- c: Winston and Strawn
- E. W. Merschoff, NRC Regional Administrator, Region IV
- L. R. Wharton, NRC Project Manager
- W. C. Walker, NRC Senior Resident Inspector
- INPO Records Center

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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO THE INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Fort Calhoun Station Unit No. 1

DOCKET NUMBER (2)

05000285

PAGE (3)

1 OF 4

TITLE (4)

Improper Shift Staffing Due to Inadequate Control of Respirator Spectacle Kits

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
06	16	97	97	-- 008	-- 00	07	16	97		05000
									FACILITY NAME	DOCKET NUMBER
										05000
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFRs. (Check one or more) (11)								
1	100	20.2201(b)	20.2203(a)(2)(v)	X	50.73(a)(2)(i)	50.73(a)(2)(viii)				
		20.2203(a)(1)	20.2203(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)				
		20.2203(a)(2)(i)	20.2203(a)(3)(ii)		50.73(a)(2)(iii)	73.71				
		20.2203(a)(2)(ii)	20.2203(a)(4)		50.73(a)(2)(iv)	OTHER				
		20.2203(a)(2)(iii)	50.36(c)(1)		50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A				
		20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)					

LICENSEE CONTACT FOR THIS LER (12)

NAME

Erick P. Matzke, Station Licensing Engineer

TELEPHONE NUMBER (include Area Code)

(402) 533-6855

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

During a plant tour with an NRC Inspector on May 6, 1997, a station manager discovered that certain Licensed Operators (LO) did not have prescription respiratory glasses available to be used in response to an emergency if Self Contained Breathing Apparatus (SCBA) respirators were needed. A number of Fort Calhoun Station (FCS) LO are required by their individual licenses to wear glasses when operating plant equipment.

The root cause of this event is that the program for obtaining and maintaining the corrective lenses did not have appropriate administrative processes to ensure compliance with 10 CFR requirements. Additionally, individuals have not been accountable for obtaining and maintaining the spectacle kits if they needed them. A contributing cause of this violation is that the reduced use of respirators for routine work diminished the attention to the respiratory program and the need to maintain the spectacle kits.

LO who are regularly assigned to control room operations that require corrective lenses have either contacts or respirator spectacle kits available. The FCS Safety Manual was revised to add specific guidance for obtaining corrective lenses for respirators.

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TEXT CONTINUATION

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Fort Calhoun Station Unit No. 1	05000285	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		97	- 008	- 00	

TEXT (if more space is required, use additional copies of NRC Form 366A) (17)

BACKGROUND

10CFR55.21 states: "An applicant for a license shall have a medical examination by a physician. A licensee shall have a medical examination by a physician every two years. The physician shall determine that the applicant or licensee meets the requirements of 10CFR55.33(a)(1)."

All Fort Calhoun Station (FCS) NRC Licensed Operators (LO) receive a NRC LO physical on an annual basis in accordance with Standing Order (SO) G-93 "NRC Licensed Operator Physicals." A visual examination is one of the examinations required during the physical.

The NRC reviews the results of the LO physicals, and if corrective lenses are required for operating plant equipment it is added as a specific license condition. A review of the current active licenses indicated that 27 of the 37 LO have that condition on their license. This condition is interpreted to mean that corrective lenses are required any time the operator is manipulating plant equipment, including under emergency conditions. Thus, corrective lenses are needed when an operator is wearing a respirator.

The Radiation Protection (RP) Plan Section 8.7.1 states, "use of soft or gas permeable contact lenses or prescription respirator eyeglasses may be used inside a respirator face piece. Contact lenses or eyeglasses other than those specified may not be used."

The RP Administrative Procedure on respiratory protection, RP-AD-500 "Respiratory Protection Program" states: "Gas permeable and soft contact lenses may be worn with respiratory protection devices provided the individual has previously demonstrated successful experience wearing contact lenses, and had practice wearing a respirator while wearing contact lenses." "Prescription eyeglasses for use inside a full face respirator requiring a face piece-to-face seal may be ordered, when required, from the Plant Administration Department." This flexibility allows the operator to choose the type of corrective eyewear he or she wishes to use when wearing a respirator.

The FCS Safety Manual also states in Section VI-3, 11.3 "Glasses with standard temple bars shall not be worn with full face piece respirators. If prescription glasses must be worn with a full face piece respirator, a prescription eyeglass insert shall be provided. The lenses will be provided under the company's Prescription Spectacle Program."

At FCS the responsibility for having and maintaining spectacle kits for wearing respirators is each individual's responsibility.

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TEXT (if more space is required, use additional copies of NRC Form 366A) (17)

EVENT DESCRIPTION

During a plant tour with an NRC Inspector on May 6, 1997, a station manager discovered that certain licensed operators did not have respiratory glasses available to be used in response to an emergency if Self Contained Breathing Apparatus (SCBA) respirators were needed. A 27 FCS LO are required by a license condition on their license to wear glasses when operating plant equipment.

On June 16, 1997, the PRC determined that the lack of proper emergency vision correction for the plant's LO constituted a violation of the plant's Technical Specification for station staffing. This report is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

SAFETY SIGNIFICANCE

A condition of most of the Reactor Operator and Senior Reactor Operator licenses at FCS is that prescription lenses must be worn while performing licensed duties. Conditions which require the entire licensed staff to don respiratory equipment are extremely rare. While the lack of corrective lenses does not meet the requirements of the operators licenses, with the numerous checks and balances built into the operating procedures of the plant there is little likelihood that this failure would have significantly affected the operation of the plant. Therefore, this event has little nuclear safety significance.

CONCLUSIONS

The root cause of this event is that the program for obtaining and maintaining the corrective lenses did not have appropriate administrative processes to ensure compliance with 10 CFR requirements. Additionally, individuals have not been accountable for obtaining and maintaining the spectacle kits if they needed them.

A contributing cause of this violation is that the reduced use of respirators for routine work diminished the attention to the respiratory program and the need to maintain the spectacle kits.

CORRECTIVE ACTIONS

The following corrective measures have been taken:

1. A number of control room operators needed spectacle kits. While the spectacle kits were being obtained, only control room operators who were in

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compliance with their license requirements were assigned as incident commanders.

2. Radiation Protection form FC-RP-509-2, "Respirator Fit Test Form," was revised requiring individuals to acknowledge whether they have current corrective lenses for respiratory equipment. This will ensure that if someone needs a spectacle kit, it will be brought to the attention of the individual and prompt the spectacle kit to be ordered. This was completed as a means of identifying personnel requiring new corrective lenses.
3. Section VII-4, Subsection 9.8, of the Fort Calhoun Safety Manual was revised, adding specific guidance for obtaining corrective lenses for respirators.
4. It was verified that licensed operators, that require corrective lenses, who are regularly assigned to control room operations either have contact lenses or respirator spectacle kits available.

The following additional actions will be taken:

The process for obtaining corrective lenses for respiratory equipment (spectacle kit) as defined in the safety manual will be included in initial and requalification Level III General Employee Training (Respirator Qualification Training). These actions will be completed by July 31, 1997.

PREVIOUS SIMILAR EVENTS

There have not been any previous incidents of this nature.