

OPPD

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

July 25, 1988
LIC-88-638

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

References: 1. Docket No. 50-285
2. Letter from the NRC (L. J. Callan) to OPPD (R. L. Andrews)
dated June 23, 1988

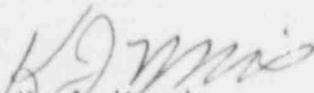
Gentlemen:

SUBJECT: Response to NRC Inspection Report 50-285/88-12

Omaha Public Power District (OPPD) recently received the subject Notice of Violation, Reference 2. One violation was identified pertaining to the failure to meet the license condition of a Senior Reactor Operator.

Pursuant to 10 CFR Part 2.201, please find attached OPPD's response. If you have any questions concerning this matter, please contact us.

Sincerely,


K. J. Morris
Division Manager
Nuclear Operations

KJM/me

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Ave., N.W.
Washington, DC 20036

R. D. Martin, NRC Regional Administrator
P. D. Milano, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector

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Attachment

Response to Notice of Violation

During an NRC inspection conducted on April 4-8 and 18-22, 1988, a violation of NRC requirements was identified. The violation involved the failure to meet the license conditions of a licensed operator. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation is listed below:

10 CFR 50.54(l) requires that:

"The licensee shall designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators pursuant to Part 55 of this chapter."

10 CFR 55.53(h) requires that licensed operators shall complete a requalification program as described by 10 CFR 55.59.

10 CFR 55.59(c) requires that the requalification program must be conducted for a continuous period not to exceed 2 years. It further requires that the requalification program must include preplanned lectures on a regular and continuing basis throughout the license period.

Contrary to the above, during the period June 8 to October 5, 1987, a licensed senior reactor operator failed to attend a majority of the preplanned lectures scheduled by the licensee's requalification program. The licensed senior operator, whose qualification was thus in question, subsequently was scheduled for and assumed the responsibilities of shift supervisor on October 10, 1987.

This is a Severity Level IV violation. (Supplement I)(285/8812-01)

OPPD's Response

The Reason for the Violation, if Admitted:

The violation is admitted. The Fort Calhoun Training Department recognized that the licensed Senior Operator in question had not been routinely participating in the approved requalification training program. The individual was informed by memo on October 9, 1987 of this fact, and he was given a deadline of October 30, 1987 for making up training that he had missed. However, the licensed Senior Operator was not specifically informed that he was prohibited from performing licensed duties. The cause of the violation was thus a lack of positive administrative controls to ensure that a licensed individual did not continue to perform licensed duties in the event that he failed to routinely participate in licensed operator requalification training.

Attachment (Continued)

The Corrective Steps Which Have Been Taken and the Results Achieved:

As discussed in the Inspection Report, on-the-spot procedure changes and temporary modifications that were signed by the individual in question have been reviewed and countersigned by an individual with a current license. The training records for the 1988 requalification training of licensed individuals have been reviewed, and it has been verified that each individual has routinely participated in licensed requalification training.

The Corrective Steps Which Will be Taken to Avoid Further Violations:

A revision to "Training Administrative Procedure" TAP-13 has been prepared to provide specific training attendance requirements. This revision will require attendance of at least 75% of scheduled requalification training. Training which cannot be attended must be made up, with a maximum not to exceed 25% of the scheduled requalification. Lectures are made up by viewing videotapes. In addition, the revision to TAP-13 will require that a licensed individual who has failed to meet the attendance requirements of requalification training to be notified in writing that he is prohibited from performing any licensed duty. This written notification will require receipt verification. Written notification that an individual has been prohibited from performing any licensed duty will also be sent to the Plant Review Committee Chairman and the Supervisor - Operations. These written notifications should prevent individuals whose qualifications have lapsed from performing duties normally assigned to licensed Senior Reactor Operators.

Approval of the revisions to TAP-13 is expected to obviate further violations. In addition, a memorandum will be issued to all licensed individuals informing them of the revised attendance requirements in TAP-13.

The Date When Full Compliance Will be Achieved:

OPPD is currently in full compliance in that licensed individuals have routinely participated in licensed requalification training. The revisions to TAP-13 described above will be approved by August 5, 1988.