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

August 30, 1988 LIC-88-661

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

Reference:

Docket No. 50-285

2. Letter from OPPD (R. L. Andrews) to NRC (J. M. Taylor)

dated April 10, 1987 (LIC-87-086)

3. Letter from OPPD (R. L. Andrews) to NRC (R. D. Martin)

dated December 23, 1987 (LIC-87-691)

Gentlemen:

SUBJECT: Implementation of a Commitment Tracking System

In Omaha Public Power District's (OPPD) response to the Safety System Outage Modification Inspection (SSOMI), a Corrective Action Plan was presented in Reference 2, and updated in Reference 3, which included a plan for implementation of a Commitment Tracking System (Section 7.4 of References 2 and 3). This plan listed several action items which were initiated to improve the quality and retrievability of commitment data.

The purpose of this letter is to provide the status of the implementation of the Commitment Tracking System, and to discuss updated plans, superseding those in References 2 and 3. OPPD has gained an increased understanding of the potential benefits of the system which was not reflected in the original; 1. This update is intended to clarify OPPD's current plans so that efforts can be directed to achieve the greatest benefit, both from a management and a compliance standpoint. These revised plans address several areas which lacked specificity in previous submittals.

The SSOMI Corrective Action Plan emphasized the following aspects of Commitment Tracking implementation.

- Establishment of a data structure to ensure retrievability of historical data.
- Review of various documents to identify and code commitment data to support retrieval
- Development or proceedment of software with the capability to provide the required access to data

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U. S. Nuclear Regulatory Commission LIC-88-661 Page 2 OPPD has collected extansive commitment data (primarily from correspondence), has entered approximately 75% of the data collected to date, and has developed software capable of accessing this data. A Basic Users's Guide has been issued which addressed commitment retrieval, and introductory training has been initiated. OFPD's future plans focus on making this data as useful and accessible as possible. These plans include: Implement procedure for continuing identification of commitments from correspondence (scheduled completion: August 31, 1988) Complete data entry for identified historical commitments (scheduled completion: September 30, 1988) Phase out existing regulatory and management action tracking logs, and incorporate required functions into Commitment Tracking System (scheduled completion: September 30, 1988) In conclusion, much planning and effort has gone into the development of this system, and while significant additional work is planned, OPPD believes that we have succeeded in creating an improved Commitment Tracking System. Following completion of plans discussed above, efforts will focus on resolution of the current status of selected commitments, and identification of implementing procedures for ongoing commitments. Data and software enhancements will continue as additional potential uses for the system are identified. If you have any questions concerning this matter, please do not hesitate to contact us. Sincerely, Division Manager Nuclear Operations KJM/m.g c: LeBocuf, 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