

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

May 2, 1988
LIC-88-294

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

References: 1. Docket No. 50-285
2. Letter from NRC (L. J. Callan) to OPPD (R. L. Andrews) dated
March 25, 1988

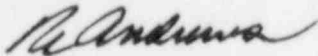
Gentlemen:

SUBJECT: Response to Notice of Violation - NRC Inspection Report
50-285/88-07

Omaha Public Power District (OPPD) recently received Reference 2, Notice of Violation, issued as a result of the subject inspection report. Pursuant to 10 CFR Part 2.201, please find attached OPPD's response to the violations. A one week extension for this submittal was discussed between J. J. Fisicaro of OPPD and Tom Westerman of Region IV.

If you have any questions concerning this matter, please contact us.

Sincerely,



R. L. Andrews
Division Manager
Nuclear Production

RLA/me

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

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

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ATTACHMENT

During an NRC inspection conducted on February 1-29, 1988, violations of NRC requirements were identified. The violations involved the failure to meet the fire brigade manning requirements specified in the Technical Specifications and the failure to follow procedures. 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. Technical Specification 5.2.2.e states, in part, that a fire brigade consisting of five members shall be maintained on site at all times. The fire brigade shall not include the minimum shift crew necessary for safe shutdown of the unit.

Section 6.1 of Amendment 40 to the Technical Specifications, which issued the fire protection safety evaluation report, states, in part, that the licensee has proposed a five-man fire brigade to be available on site during all shifts, and independent of demands placed on operating personnel and the security force in a fire situation. This requirement is being incorporated into the Technical Specifications with implementation by March 1979.

Contrary to the above, the licensee did not maintain a fire brigade consisting of five members independent of demands placed on operating personnel and the security force in a fire situation in that security personnel were assigned collateral duties as compensatory measures watchstanders.

This is a Severity Level IV violation (Supplement 1) (285/8807-02)

OPPD'S RESPONSE

Reason for Violation if Admitted

The five-man fire brigade is staffed utilizing operators and security officers. In the event of a fire in the control room requiring implementation of Abnormal Operating Procedure 6 (AOP-6), three operators and two security officers are required to man the fire brigade. Due to manning requirements for a compensatory security station, and other duties procedurally assigned to the control room security officer, only one of two security officers needed for the fire brigade were immediately available.

The violation occurred due to a failure to integrate all requirements and/or commitments related to the fire protection, emergency planning and security areas. This resulted in procedural conflicts related to security officer responsibilities for fires in conjunction with valid security contingencies.

Corrective Steps Taken and Results Achieved

A procedure change was immediately implemented to revise AOP-6 to reassign certain security officer's non-fire fighting duties to an operator; thus, freeing him for immediate assignment to the fire brigade. With this change and the existing minimum staffing levels for operators and security officers, adequate trained personnel are available to meet fire brigade, operational, armed responder and emergency planning commitments for a fire requiring evacuation of the control room with a concurrent valid security contingency.

Violation A (Continued)

Additionally, a modification was expedited to upgrade the vital area barrier which had required a long term compensatory station; this modification is complete and the officer that was stationed at the compensatory post is now available for regular shift duties including fire brigade membership.

The plant's management has a heightened awareness of the need to ensure that adequate staff exists at all times to meet fire brigade, security, emergency planning and operational requirements. Controls have been implemented to ensure that when a compensatory post is required, additional officers are called in as necessary to meet staffing commitments.

Corrective Steps That Will be Taken to Avoid Further Violations

The security plan commitments, existing NRC guidance documents and plant procedures will be reviewed relative to staffing concerns. Revisions, if necessary, will be made to procedures and/or the Security Plan. To ensure that commitments related to fire brigade and security manning are correctly identified and documented. The review will be completed by May 31, 1988, with necessary procedure changes being promptly initiated.

OPPD has recently completed a reevaluation of the Fort Calhoun Fire Hazards Analysis (FHA) and is using the FHA as the basis for a reevaluation of the Safe Shutdown Analysis (SSA). The SSA will identify operator action response requirements for fire in any fire area. The results of this analysis will be used to establish formal controlled pre-fire plans that will clearly define manning requirements. This effort is currently scheduled for completion by September 30, 1988.

Date When Full Compliance Will be Achieved

OPPD is currently in full compliance with fire brigade manning commitments. Other efforts to enhance compliance with fire brigade staffing requirements will be completed in accordance with the above noted schedules.

Violation B

- B. 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 ANSI 18.7-1972.

Section 5.1.2 of ANSI 18.7-1972 states, in part, that procedures shall be followed and the requirements for use of procedures shall be prescribed in writing.

Procedure SO-G-7 states, in part, that it is the responsibility of every individual performing activities to follow procedures exactly as written and it further states that strict adherence to all procedures is absolutely required.

Contrary to the above, during witnessing of the performance of Surveillance Tests ST-ISI-RW-1, ST-ESF-6, and ST-DC-2, the NRC inspectors noted that the individual performing the test did not adhere to the written procedure in that steps were not performed as required by the procedure, or steps were not performed in the order specified by the procedure.

This is a Severity Level IV violation. (Supplement I)(285/8807-03)

OPPD'S RESPONSE

Reason for the Violation if Admitted

Surveillance test ST-DC-2 verifies the proper operation of the spare battery charger #3. There is a thirty minute waiting period before taking final readings off battery charger #3. The next step is to place battery charger #1 in service. The electrician performing ST-DC-2, knowing that it would be good operating practice to let battery charger #1 warm up prior to being placed back in service, started battery charger #1 before completing the readings on battery charger #3 in the previous step.

Surveillance test ST-ISI-RW-1 verifies the operability of raw water valves by recording and trending the stroke times. The special equipment designated by this procedure is a stop watch. The operator performing the timing in the field was observed using a wrist watch to time the valves. The operator used the wrist watch assuming that the timing would be accurate enough for the results needed.

Surveillance test ST-ESF-6 verifies the emergency diesel generator start circuits and operability of the fuel oil transfer pumps. The resident inspector stated that a step to observe the proper operation of the fuel oil transfer pumps had been forgotten by the control room operator performing the test, but the control room operator had already dispatched an equipment operator to perform that step in the test. ST-ESF-6 had been performed as specified by the procedure.

The two cases of procedural noncompliance were violations of S.O. G-7 which presently states that procedures will be followed exactly as written. In both cases, the intent of the procedure was followed to obtain acceptable results, but the procedure was not followed verbatim. The manner in which the tests were performed did not affect the safe operation of the plant.

Violation B (Continued)

Corrective Steps Which Have Been Taken and the Results Achieved

The items noted in the violation, and as detailed in the inspection report were addressed. Specifically, there was no safety significance to ST-DC-2 being performed in the manner witnessed; no corrective action was necessary. The valve timing witnessed in Surveillance test ST-ISI-RW-1 was repeated using a stop watch. Valves timed during this test using a wrist watch were retimed with a stopwatch. Results of the test were satisfactory. As noted in The Reason for the Violation, ST-ESF-6 was performed according to procedure; no additional action was required. The inspection report notes these as examples of inattention to detail and procedural non-compliance. To address this concern a memo from the Plant Manager to department heads was issued on February 16, 1988. This memo stressed the importance of compliance with procedures. Documented meetings with plant personnel were held to reiterate the Station policy and to reaffirm the need to follow and comply with procedures exactly as written.

The awareness of this issue is evidenced by an increase in on-the-spot procedure changes for clarifying and correcting procedures. In addition to the efforts made to heighten awareness of Station personnel, OPPD recognizes that a portion of this violation is attributable to procedures which are ambiguous or misleading. The ambiguity allows for interpretation by personnel in the field, resulting in the type of incidents cited in the violation. The potential for interpretations of this sort will be reduced through the Procedures Upgrade Project, discussed below.

Corrective Steps Which Will be Taken to Avoid Further Violations

The Procedures Upgrade Project includes the development of a Procedure Writer's Guide to provide guidance from a human factor's perspective. The Procedure Writer's Guide, currently in development, will provide guidance in identifying optional steps or those steps that may be performed in optional sequences, making procedures more acceptable from a human factors perspective. This should reduce the occurrence of violations of this sort.

Date When Full Compliance Will be Achieved

OPPD is in full compliance with respect to the three examples noted in the violation. The Procedures Writer's Guide will be in effect by September 1988. To enhance compliance with procedures, guidance contained in the Procedures Writer's Guide will be incorporated into procedures as part of the Procedures Upgrade Program.