



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

MAY 19 1988

MEMORANDUM FOR: File

FROM: James L. Milhoan, Director, Division of Reactor Safety

SUBJECT: INADVERTENT RELEASE OF DRAFT MATERIAL

The purpose of this memorandum is to place in the PDR copies of documents related to NRC Inspection Report 50-285/88-10. These documents were inadvertently transmitted via facsimile to a third party on April 18, 1988, the day before the report in question was signed out.

James L. Milhoan
James L. Milhoan, Director
Division of Reactor Safety

Enclosure: As stated

cc w/enclosure:
R. Martin, RIV
✓PDR 50-285 File Copy

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PDR ADOCK 05000285
Q PDR



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION IV
 211 RYAN PLAZA DRIVE, SUITE 1008
 ARLINGTON, TEXAS 76011

FACSIMILE TRANSMITTAL

DATE/TIME: 4/19/88
~~4/18/88~~

PRIORITY:
 Immediately
 1 Hour
 2-4 Hours

MESSAGE TO: Bill Johnson, SRD @ ANO
 Attn: Howard Bunder

MESSAGE FROM: Bill Seidle, RIV

NUMBER OF PAGES: 4 PLUS TRANSMITTAL SHEET

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CONTACT: Ruey Thomas, FTS 728-8184

SPECIAL INSTRUCTIONS/ATTACHMENT(S):

Transmitted & Verified by:
M. Lerner 4/19/88
 NAME DATE

DISPOSITION:
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 Other

APPENDIX A

NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
Operating License: DPR-40

During an NRC inspection conducted from March 14-18, 1988, two violations of NRC requirements were identified. The violations involved failure to promptly resolve deficiencies identified during a surveillance test and failure of the licensee to verify the correct qualifications for an examiner completing a reactor coolant system leak test. 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. Failure To Promptly Resolve Test Deficiencies

Criterion XI of Appendix B of 10 CFR Part 50 and the licensee's approved quality assurance program requires that a test program shall be established to assure that . . . systems and components will perform satisfactorily. This criterion also requires that test results shall be documented and evaluated to assure that test requirements have been satisfied.

Contrary to the above, Surveillance Test ST-NZ-1 was completed on May 8, 1987, with anomalies or deficiencies involving 11 nozzles. There was not an evaluation started of these anomalies or deficiencies until March 15, 1988.

This is a Severity Level IV violation. (Supplement I) (285/8810-01)

B. Failure to Use Correct Qualification Level of Examiner for Surveillance Test Evaluation

Section 5.8.1 of the Technical Specifications (TS) requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the minimum requirements of Section 5.1 and 5.2 of ANSI N18.7-1972. Table 1 of G-26 of the licensee's Standing Order G-26, R17, "Maintenance Quality Control Program," requires a minimum Level II capability for personnel who evaluate and report test results.

Contrary to the above, Surveillance Test ST-RLT-1, F.1 (leak test) results were evaluated and reported on May 29, 1987, by an individual qualified to a lower capability level (Level I).

This is a Severity Level IV violation. (Supplement I) (285/8810-02)

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

APPENDIX B

NOTICE OF DEVIATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
Operating License: DPR-40

Based on the results of an NRC inspection conducted from March 14-18, 1988, a deviation from your commitment was identified. The deviation consisted of failure to continue implementation of corrective actions committed to in the response to an NRC violation. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the deviation is listed below:

Failure to Continue Implementation of Corrective Actions

Violation 285/8511-01, dated June 26, 1985, involved failure to account for six surveillance tests (STs), performed during the refueling outage ending in July 1984, in the files. The licensee's response to this violation stated, in part, "Each month the surveillance test clerk will issue a list of STs that are due but not filed and those due but not completed. Each supervisor will be required to respond to this list by indicating the status of each test. This status list will then be compiled and presented to the Plant Review Committee (PRC) by the Supervisor-Technical indicating those tests not completed/not filed and the action taken to assure completion/filing by the end of the next monthly review period."

Contrary to the above, in deviation to that written commitment, a status list indicating the action taken to assure completion/filing by the end of the next monthly review period did not exist for a delinquent ST list dated March 2, 1988, which showed 11 STs dating from August 22, 1986, through the end of the 1987 spring refueling outage, as being delinquent for filing. (285/8810-03)

Omaha Public Power District is hereby requested 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 deviation: (1) the reason for the deviation 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 deviations, 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 day of 1988.

of test results records for each procedure. The TS surveillance requirements or IST component together with the associated test procedures reviewed by the NRC inspector are tabulated in the Attachment.

The NRC inspector determined that the required tests were being scheduled and performed as required in accordance with approved procedures. Acceptance criteria were specified in the procedures and, with the exceptions discussed below, the records stated satisfaction of acceptance criteria. Appropriate instructions for returning equipment to service following testing were given. Some problems involving failure to complete timely reviews of completed test records are discussed in Section 2.a. above and an example is given below.

The NRC inspector discovered that completed Procedure ST-NZ-1, Section F.1, for flow testing containment spray nozzles noted anomalies and deficiencies which had not been formally reviewed and dispositioned. Specifically, it was noted that ten nozzles were not tested because of inaccessibility and that one nozzle was not working properly. The test had been completed on May 8, 1987, and was listed as delinquent for filing in the list updated on March 2, 1988. The failure to evaluate the anomalies or deficiencies with these nozzles is an apparent violation of 10 CFR Part 50, Appendix B, Criterion XI, and the approved quality assurance program. (285/8810-01)

The NRC inspector discussed the deficiencies noted in the test record for ST-NZ-1 with plant management on March 15, 1988. The NRC inspector expressed concern that the plant was restarted with the operability of the containment spray system undetermined. A second concern expressed was that the licensee's administrative procedures for followup on test deficiencies were apparently not followed. The Supervisor-Maintenance initiated an Incident Report on March 16, 1988, to address the test problems noted. It contained the results of a preliminary safety analysis which indicated that over 100 spray nozzles must be plugged before the design flow rate of 5100 gpm would be decreased. The NRC inspector had no further safety concerns on this test.

During the inspection, the NRC inspector requested records verifying the appropriate qualification level of examiners who completed reactor coolant system leak testing on May 29, 1987, and on June 1, 1987, in accordance with Procedure ST-RLT-1, Section F.1. Because these records were not made available prior to the exit, it was discussed as an unresolved item. Copies of qualification records were subsequently forwarded by the licensee to the NRC Region IV office on March 22, 1988. The qualification record for the examiner completing the test on May 29, 1987, indicated he had only an ANSI N45.2.6, Level I qualification for hydrostatic testing. Paragraph F.1.b.(2)(a) of ST-RLT-1 states that examiners must be qualified in accordance with ASME Section XI, Article IWA-2000. Paragraph IWA-2212 of Article IWA-2000 requires the use of VT-2 visual examination for leak testing. Subarticle IWA-2300 requires qualification of personnel