UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 16, 1988

Docket No. 50-285

Mr. Fred M. Petersen, President
and Chief Executive Officer
Omaha Public Power District
1623 Harney Street
Omaha, Nebraska 68102

Dear Mr. Petersen:

SUBJECT: REINSPECTION OF SAFETY SYSTEMS OUTAGE MODIFICATION INSPECTION DESIGN FINDINGS, 50-285/88-200

This letter conveys the results and conclusions of the reinspection of the findings originally documented in Safety Systems Outage Modification Inspection (SSOMI) Report 50-285/85-22 dated January 25, 1986. The inspection team consisted of personnel from NRC's Office of Nuclear Reactor Regulation (NRR), Region IV, and consultants. The inspection took place at your offices in Omaha, Nebraska, on February 10 and the weeks of March 21 and April 4, 1988. The exit meeting was conducted on April 8, 1988.

The primary purpose of the inspection was to review the corrective actions and implementation of corrective actions for all the findings documented in the original SSOMI design inspection report. The secondary purpose of the inspection was to perform a programmatic review of Fort Calhoun's design basis reconstitution program which was developed as a result of the original SSOMI design inspection.

With regard to the corrective action review of the original SSOMI findings, 39 of the original 47 findings identified in Inspection Report 50-285/85-22 were closed. One new issue was identified in the mechanical components discipline and was closed for the purpose of the inspection report. Therefore, 40 of the 48 findings identified by NRC are closed. However, four of the closed findings are licensing issues that Omaha Public Power District (OPPD) needs to resolve. The licensing issues include adequacy of the piping analyses performed in response to NRC Bulletin 79-14 and compliance with Updated Safety Analysis Report (USAR) seismic design requirements for valves, electric motor operators, junction boxes, and pressure switches. See Findings 03.1-4, D3.2-4, 03.2-5, and D3.2-8 in the mechanical components area for a more comprehensive discussion of these licensing issues.

In reviewing the corrective actions associated with the SSOMI findings, the inspection team identified the following significant items for which increased OPPD management involvement appears to be warranted to bring the issues identified to effective resolution. First, the functional testing associated with the accumulators for air-operated valves was inadequate. Previously tested air-operated valves need to be retested or the test data

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should be reevaluated to ensure that adequate functional tests were performed. All air-operated valves with accumulators need to be functionally tested before the end of the next refueling outage using techniques that include consideration of worst-case operating conditions. Also, development of criteria for functional testing and surveillance testing of air-operated valves is recommended to ensure consistent postmodification testing and assurance of design adequacy over the life of the plant. Second, many of the corrective actions for the previously identified findings were not complete at the beginning of the inspection. Since the findings were identified by the NRC more than two years ago, the fact that many corrective actions were incomplete is indicative of a lack of attention to NRC identified issues. Further, closure of the findings required direct NRC involvement to define actions necessary for resolution. Once the inspection team identified the required actions, OPPD was able to close many of the findings. However, OPPD must be more self-sufficient and should have closed many of these findings without relying on interaction with the inspection team. It was the feeling of the inspection team that, were it not for the NRC presence, many of these corrective actions would have languished for a considerable time before being completed Third, the inspection team identified areas where the USAR is not being kept current. An updated and accurate USAR is essential for Fort Calhoun because it remains the major source of design-basis information until the design-basis reconstitution program is completed. Finally, the team identified areas where USAR commitments were not being implemented. For example, containment isolation valve position indication was not maintained for all operating modes (Deficiency D4.3-1) and valve actuator seismic acceleration design requirements were not consistently utilized (Deficiency D3.2-7).

As a result of this recent inspection, the team became aware of the many enhancements made by OPPD to its design process. OPPD's commitment to the design reconstitution program is a necessary and major undertaking. The programmatic changes were apparent to the inspection team and if properly implemented should result in an acceptable documented design basis when the work is completed in 1991, as scheduled. The team was generally impressed by the overall structure and content of the auxiliary feedwater system design basis document as well as the number of design attributes addressed in-depth in that document.

You are requested to respond in writing to the eight open items listed on pages A-1 through A-3 of the enclosed report within 60 days after receipt of this letter. You should address the specific action required for each item and the schedule for completion of that action.

In accordance with 10 CFR 2.790(a), a copy of this letter and enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this inspection, please contact Mr. Ronald Parkhill (301-492-0963) of this office.

Sincerely,

Gary M. Holahan

Gary M. Holahan, Acting Director
Division of Reactor Projects, III, IV, V
and Special Projects
Office of Nuclear Reactor Regulation

Enclosure:
Inspection Report 50-285/88-200

cc w/enclosure:
Mr. Harry H. Voigt, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, NW
Washington, D.C. 20036

Mr. Jack Jensen, Chairman
Washington County Board
of Supervisor
Blair, Nebraska 68008

Mr. Phillip Harrell, Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 309
Fort Calhoun, Nebraska 68023

Mr. Charles B. Brinkman, Manager
Washington Nuclear Operations
C-E Power Systems
7910 Woodmont Avenue
Bethesda, Maryland 20814

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Office of Executive Director
for Operations
611 Ryan Plaza Drive, Suite 10[illegible]
Arlington, Texas 76011

Mr. Harold Borchert, Director
Division of Radiological Health
Department of Health
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska 68509

Mr. W. G. Gates, Manager
Fort Calhoun Station
P.O. Box 399
Fort Calhoun, Nebraska 68023

INPO
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Atlanta, Georgia 30339

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