

OPPD

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

September 19, 1988
LIC-88-778

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 NRC (L. J. Callan) to OPPD (K. J. Morris) dated August 19, 1988

Gentlemen:

SUBJECT: Response to Notice of Violation
NRC Inspection Report 50-285/88-23

Omaha Public Power District (OPPD) received the subject inspection report which identified two violations. The violations were cited on failure to properly store unused ion exchange resins and the failure to provide adequate procedures for the start-up of the Instrument Air System. Please find attached OPPD's response to the Notice of Violation in accordance with 10 CFR Part 2.201.

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

Sincerely,

K. J. Morris

for K. J. Morris
Division Manager
Nuclear Operations

KJM/mc

c: LeBoeuf, Lamb, Leiby & MacRae
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R. D. Martin, NRC Regional Administrator
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ATTACHMENT

During an NRC inspection conducted on July 1-31, 1988, violations of NRC requirements were identified. The violations involved the failure to properly store unused ion exchange resins and the failure to provide adequate procedures for start-up of the instrument air system. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below.

- a. Section II.A of Appendix R to 10 CFR Part 50 states, in part, that a fire protection program shall be established at each nuclear power plant and the program shall establish procedures required to implement the program.

Section 3.3 of the Updated Fire Hazards Analysis and Section 3.3.1 of Procedure SO-G-6, "Housekeeping," state, in part, that unused ion exchange resins should be stored in an area protected by an automatic detection/sprinkler installation.

Contrary to the above, the licensee stored eight barrels of unused ion exchange resins in Room 69 which does not have a sprinkler system installed.

This is a Severity Level IV violation. (Supplement I) (285/8823-03)

OPPD'S RESPONSE

The Reason for the Violation if Admitted

The violation is admitted as stated. The resin was put into Room 69 to conduct a resin addition procedure. The procedure was not completed until several days later. Resins have normally been brought into Room 69 to be available when the appropriate personnel can conduct the procedure. It was not the intent to store the resin other than for this short period of time. Also, Operations personnel were unfamiliar with statements contained in the UFHA regarding resin storage.

The Corrective Steps That Have Been Taken, and the Results Achieved

Upon notification of the condition on the date of the occurrence, the initial response by Plant Engineering was based on a review of the UFHA for fire area/zone 20.7. Section 5.2 of the UFHA for fire area 20.7 contains a list of allowable combustion levels for Room 69 which includes 1000 lbs. of unused resin. The individual responding personally inspected the storage area with the intent of assessing the condition which was "analyzed" versus what presently existed. Since the analyzed condition (1000 lbs. of ion exchange resins) is considered adequate for the fire area/zone boundaries, it was believed that returning to this baseline condition would ensure compliance. His recommendation was, therefore, to remove four barrels of resins at 217 lbs. per barrel, leaving 868 total lbs. of resins. Furthermore, the individual responding, unaware of the inconsistency within the UFHA, believed that good housekeeping practices were being maintained, and that adequate spatial separation from safety-related equipment existed.

Attachment (Continued)

A follow-up conversation, which took place the following day, uncovered the statement made in Section 3.3 of the UFHA, and requirement 3.3.1 of Standing Order G-6, which conflict with Section 5.2 of the UFHA. Upon discovery of this inconsistency, the remaining resins were removed from the area, and stored in a non-safety related area protected by automatic detection and sprinkler systems.

The Corrective Steps That Will be Taken to Avoid Further Violations

1. A procedure change to Standing Order G-6, "Housekeeping", will be made to change the wording of Section 3.3.1 to reflect that unused ion exchange resins shall be stored in an area protected by an automatic detection/sprinkler installation.
2. The Updated Fire Hazards Analysis will be revised to resolve the discrepancy between Sections 5.2 and 3.3. This will be performed by stating that unused ion resins are to be stored in an area with automatic detection/suppression unless the presence of the resin is analyzed.
3. Standing Order G-6, "Housekeeping", will be revised as necessary to include a mechanism for identification of special requirements pertaining to combustible materials storage and use, and to resolve any conflicts with the Updated Fire Hazards Analysis.
4. A controlled copy of the Updated Fire Hazards Analysis will be maintained in the control room. Operations personnel will be trained on the document's content by April 1, 1989.

The Date When Full Compliance Will be Achieved

The change to Standing Order G-6 will serve as an interim control until items 2, 3, and 4 are completed. Item 1 will be completed by September 23, 1988. Items 2 and 3 will be completed by February 1989, and Item 4 will be completed by April 1989.

Attachment (Continued)

- b. TS 5.8.1 states, in part, that written procedures shall be established that meet the minimum requirement of Regulatory Guide 1.33.

Section 3 of Regulatory Guide 1.33 states, in part, that instructions for start-up should be prepared, as appropriate, for the Instrument Air System.

Contrary to the above, the licensee did not provide adequate instructions for start-up of the Instrument Air System in that position verification for all instrument air supply valves to safety-related components and equipment was not included in operating instructions for plant systems. For example, instructions were not provided for verification of the air supply valves in the containment spray and Safety Injection Systems.

This is a Severity Level IV violation. (Supplement I) (285/8823-04)

OPPD RESPONSE

The Reason for the Violation if Admitted

OPPD admits the violation as stated. The Instrument Air System was originally developed and designated as a non-safety related system. Since the system was so designated, not all instrument air valves have identifying tag numbers nor are all instrument air valves located on Piping & Instrumentation Diagrams (P&IDs).

The Corrective Steps That Have Been Taken, and the Results Achieved

As a part of OPPD's corrective actions to address the SSOMI report, various generic activities related to air accumulators were undertaken. One of these activities involved Operations Support Analysis Request (OSAR) 87-10, which was completed on April 6, 1988 to identify "safety related" valves which utilize accumulators to perform their design function. A walkdown of these safety related accumulators outside containment has been performed to identify associated air supply valves. A request for drawing revision has been initiated to provide for proper drawing updates and tagging of these supply valves.

The Corrective Steps That Will be Taken to Avoid Further Violations

Addition of the valves which supply safety related accumulators to the start-up checklists will be initiated when drawing revisions are complete. Procedure changes to the check lists will be performed to provide for lineup of the supply valves associated with the "safety related" accumulators. A further walk-down of the three remaining "safety related" accumulators, HCV-238, HCV-239, and HCV-240 will be performed during the 1:38 outage to verify P&ID's and tag associated supply valves. These valves will then also be added to the proper start-up valve lineup.

Attachment (Continued)

In addition, a start-up checklist will be developed to line-up Instrument Air riser valves and main header valves and will include double verification. This checklist will be completed and performed prior to restart following the 1988 refueling outage.

A system walkdown of valves lined-up in the start-up check lists which have handwheels will also be performed prior to the end of the 1988 outage. Those handwheels which might affect valve operation if positioned incorrectly will be added to the start-up check lists.

The completion of these actions will ensure that the air supply route to valves with safety related accumulators are correctly identified and lined-up. This is considered to be the critical portion of the air system and these actions will be complete prior to the end of the 1988 outage.

The remainder of the instrument air valves will be given identifying tag numbers and placed on the P&IDs as part of Project 1991. Those associated with safety-related air operated valves will then be added to the startup checklist as appropriate. These root valves are not a safety concern because system design is such that safety related air operated valves go to the fail-safe position in the event the instrument air is isolated.

The Date When Full Compliance Will be Achieved

Full compliance will be achieved by addition of the affected valves to the start-up check lists for the safety related valves which utilize accumulators prior to the end of the 1988 outage. The instrument air root valves to safety related valves will be added to the P&IDs in accordance with the Project 1991 schedules.