

**Omaha Public Power District**  
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402/536-4000

September 30, 1988  
LIC-88-877

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 OPPD (R. L. Andrews) to NRC (Document Control Desk) dated June 3, 1988 (LIC-88-393)
  3. Letter from OPPD (K. J. Morris) to NRC (Document Control Desk) dated July 6, 1988 (LIC-88-514)

Gentlemen:

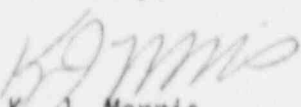
SUBJECT: Second Bimonthly Update on the Radiological Improvement Project

Omaha Public Power District (OPPD) committed in Reference 2 to provide a bimonthly status of actions taken in regards to the Fort Calhoun Station Radiological Improvement Project. In the past two months, OPPD has made considerable progress in addressing items contained in Inspection Report 50-285/88-05, and it is our understanding that items 8805-04, 05, 06 and 11 are under review to be closed by Inspection 88-30 which was recently conducted by Region IV. Please find attached a discussion of the major actions taken since the last update.

OPPD is planning to arrange a meeting in October 1988 to discuss the status of the improvements made in the area of Radiation Protection. OPPD intends as a part of this meeting to present the results of the overall Radiation Program.

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

Sincerely,

  
K. J. Morris  
Division Manager  
Nuclear Operations

KJM/rh

c: LeBoeuf, Lamb, Leiby & MacRae  
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R. D. Martin, NRC Regional Administrator, Region IV  
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## Radiation Improvement Project (RIP)

The Radiation Improvement Project (RIP) established in February, 1988 continued to direct and monitor radiation protection improvement activities. The following is a discussion of the major tasks that have been accomplished since the last status report. Other items from Inspection Report 88-05 are either complete as previously reported or will be completed in accordance with schedules provided to the NRC.

From July 1, 1988 to August 23, 1988, the RIP was under the interim management of Fred F. Franco, Manager - Emergency Planning. Responsibility for incorporating the RIP into the Radiological Enhancement Program has since been transferred to W. G. Gates - Plant Manager.

Hydro Nuclear Services has been contracted to coordinate RIP for the Plant Manager and has performed an assessment of the Fort Calhoun radiation protection program. The assessment was performed in July and presented to OPPD management in August. Short term enhancements resulting from this assessment in support of the 1988 outage include the procurement of additional radiation monitoring instruments, the enhancement of key radiation protection implementing procedures and the assignment of assessors to evaluate radiological practices on a day to day basis.

The RIP has developed a Preliminary Action Matrix that brought together assessment findings of OPPD, Stone and Webster, Chemston Technology and INPO. This Matrix is currently under OPPD review for inclusion into the Enhancement Program as appropriate.

A draft revision of the Radiation Protection Plan has been completed and is under review by the Radiological Enhancement Project. The Plan will be implemented in stages during the next year. An initial health physics procedure index has been prepared as a guide to the development of Radiation Protection Implementing Procedures.

Recommendations for equipment inventory, including whole body counter, TLD processing system, trash and laundry monitors and health physics field instruments were prepared and are currently under review for approval and implementation.

Training was conducted during July and August for selected technicians, supervisors and vendor supplied technicians. This training included reactor systems training, training to prepare technicians for the National Registry of Radiation Protection Technologists examination, training to familiarize the health physics organization with issues and techniques related to "hot particles" and an "internal dosimetry" course taught by Dr. John Poston of Texas A&M University.

### Action on Specific Regulatory Items from Inspection 8805

#### Violation 8805-02

The violation concerned the control of Very High Radiation Areas (VHRA). To improve control of VHRA's OPPD committed to reducing the size of the area in the truck bay to provide more positive control.

The size of the Very High Radiation Area that originally occupied the whole of the Auxiliary Building Truck Bay next to the Spent Fuel Pool area was reduced to a floor space less than ten percent of the truck bay. This was accomplished through construction of an effective personnel barrier above the shield walls of the waste processing equipment that was the source of the radiation field. This effort resulted in receipt of new nuclear fuel and the conduct of other essential work being conducted outside a Very High Radiation Area in the truck bay.

Open Item 8805-08

This item involved the lack of organized and comprehensive radiation protection procedures.

A schedule for Radiation Protection Manual procedure completion including the goals and milestones for a new Radiation Protection Plan and Implementing Procedures was produced and is under OPPD management review.

Open Item 8805-10

This item involved the lack of a systems training program for radiation protection technicians.

Systems training for current technicians is completed. The Radiation Protection Training Program Master Plan (TPMP) has been revised to include systems training. The TPMP has also been revised to provide training for technician specialties in addition to the training for Radiation Protection Shift Technicians.

Concern, Page 5, Paragraph 3 of Inspection Report 88-05

The concern was that plant management has not been effective in procuring the quality and number of expendable items to support the radiation protection program.

A review of protective clothing quality and availability was conducted. This information is being used to upgrade the protective clothing stocks for normal use and for the 1988 refueling outage.

Concern, Page 11, Paragraph 2 of Inspection Report 88-05

The concern was that OPPD's Supervisors Manual did not mention or encourage the Employee ALARA Concern Form.

A draft change to the OPPD Supervisors' Manual policy statement on ALARA to encourage use of the ALARA concern form has been completed.

Concern, Page 14, Top of Page of Inspection Report 88-05

The concern was that several incidents demonstrated a lack of adherence to industry practices. One of the items cited was that frisker stations were not used to control the spread of contamination.

Frisker Stations have been upgraded through addition of protective clothing stocks in several locations and through greater availability and accessibility to contaminated area exit points.

OPPD believes appropriate actions addressing the following items of Inspection Report 88-05 have been performed:

Violation 8805-01	Radiation Protection Technician Qualification
Violation 8805-04	Failure to Use the Two Man Rule
Violation 8805-05	Failure to Post a Controlled Surface Contaminated Area
Violation 8805-06	No Policy on Respiratory Protection Program
Violation 8805-07	Radiation Protection Reorganization
Violation 8805-11	C/RP Supervisor Alternates
Violation 8805-12	Contamination Release Limits
Concern, p. 10, Para. 2 of IR 8805	ELT Qualifications

Other regulatory items from Inspection Report 88-05 are either complete as previously reported or will be completed in accordance with schedules provided to the NRC. OPPD is planning to arrange a meeting in October 1988 to discuss the status of the improvements made in the area of Radiation Protection.