

Omaha Public Power District
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402/536-4000

June 6, 1988
LIC-88-375

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

- References:
1. Docket 50-285
 2. Letter OPPD (R. L. Andrews) to NRC (E. J. Butcher) dated September 26, 1985 (LIC-85-439)
 3. Letter NRC (W. A. Paulson) to OPPD (R. L. Andrews) dated March 9, 1987
 4. Letter NRC (W. A. Paulson) to OPPD (R. L. Andrews) dated May 14, 1987
 5. Letter OPPD (R. L. Andrews) to NRC (W. A. Paulson) dated June 2, 1987 (LIC-87-377)
 6. Letter OPPD (R. L. Andrews) to NRC (Document Control Desk) dated March 8, 1988 (LIC-88-043)

Gentlemen:

SUBJECT: Request for Additional Information With Regard to Generic Letter 83-28, Item 2.2.2. - Review of Safety-Related Vendor Manuals Received Prior to June 1985

Per recent telephone conversations between D. Matthews/R. Mueller, of OPPD, and A. Bournia/D. Latch, of the NRC, several items relating to the intent and content of the Project 1991 "Vendor Manuals Upgrade Program" were discussed. Specifically highlighted in the conversation were discussions relating to the following topics:

OPPD's plans, if any, for establishing periodic contact with vendors of key components to facilitate the exchange of technical information.

OPPD's plans, if any, for establishing a formal interface with diesel generator and switchgear vendors.

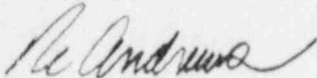
OPPD's overall goals and objectives with regard to the Project 1991 "Vendor Manuals Upgrade Program" and previous Generic Letter 83-28 commitments.

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The concerns relating to the aforementioned issues were addressed to the general satisfaction of both parties involved. It was requested that OPPD submit written documentation responding to those concerns so that a more comprehensive review of the subject matter can be undertaken. Therefore, the attachment to this letter provides the information requested.

Should there be any further questions or comments concerning this matter, please do not hesitate to contact us.

Sincerely,



R. L. Andrews
Division Manager
Nuclear Production

RLA/me

c: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Ave., N.W.
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R. D. Martin, NRC Regional Administrator
P. D. Milano, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector

ATTACHMENT

DESCRIPTION OF THE PROJECT 1991 "VENDOR MANUALS UPGRADE PROGRAM"

The Vendor Manuals Upgrade Program is part of the OPPD coordinated effort known as Project 1991. Project 1991 was created to address several areas at the Fort Calhoun Station requiring immediate action with the goal of "excellence" with regard to the subject areas by the end of the year 1991. The specific project areas of Project 1991 include the following:

- Facility Appearance Upgrade
- Preventive Maintenance Program Upgrade
- Procedures Upgrade
- Trending and Root Cause Analysis
- Vendor Manuals Upgrade Program
- CQE Procurement and Storage
- Labeling
- Asbestos Abatement
- Welding/Torquing
- Instrument Loop Uncertainties
- Computer Support/Master Equipment List

The goal of the Fort Calhoun Station's Vendor Manual Upgrade Program is to provide technical manuals that are current, correct, and provide the best information available to fulfill the needs of operations, maintenance, and other Station personnel.

The scope of the Vendor Manuals Upgrade Program will not only include the review and approval of vendor manuals pertaining to safety-related equipment but also include the review and approval of vendor manuals pertaining to non-safety-related equipment. The present schedule for completing the reviews (described above) is as follows:

- 1) Complete the review of approximately 760 vendor manuals that pertain to safety-related equipment by March of 1989. Please note that the manuals to be reviewed by March of 1989, (Approximately 760), corresponds directly to the the number of safety-related vendor manuals received by the Fort Calhoun Station as of June 1, 1985 and is consistent with the basis of the existing NRC commitment.
- 2) Complete the review of remaining vendor manuals, (those received by the Station after June 1, 1985), which pertain to safety-related equipment immediately after the completion of item 1, above.
- 3) Complete the review of vendor manuals which pertain to non-safety-related equipment. This task is scheduled to begin immediately following the historical review of vendor manuals which pertain to safety-related equipment and should be completed by December 31, 1991.

The Project 1991 historical review will encompass the following major areas:

Review Package Development - This process entails assembling information and vendor publications into packages which will facilitate the Technical Review of these publications.

Technical Review - In this program phase vendor publications will be technically reviewed to ensure vendor information is current, adequate, applicable and appropriately referenced in plant procedures. The technical review of Station vendor manuals will encompass all concepts set forth in INPO Good Practice DE-102 - "Control of Vendor Manuals".

Project Tracking - This phase of the project will create data bases to track the progress of each technical document review.

Revision Control - Via this phase of the project, procedures will be implemented to control the receipt, review, and update of vendor technical manuals after their initial review and approval.

Technical Manual Data Base - Procedures will be implemented to control and catalog information which could be applicable to a vendor manual. Examples of such information are: OPPD equipment tag number to manufacturer catalog cross-references, vendor contact-by name and telephone number, applicable print lists, applicable procedures lists, etc.

Source Document File Development - Source documents consist of information which could pertain to the content of a vendor manual technical review and would consist of items such as: station modification packages, NRC Bulletins, IE Circulars, plant operating and maintenance procedures, etc. These source documents will be arranged, referenced, and controlled in such a manner so as to expedite the review of a specific vendor manual and also create a retrievable and historical record of source documents used in the process of reviewing a vendor technical manual.

As discussed previously via OPPD's phone conversation with Mr. A. Bournia and Mr. D. Latch of the NRC, manuals pertaining to the station's diesel generator and safety-related switchgear will be priority items on the lists of vendor manuals and documents to control and evaluate in accordance with the vendor manual program described above.

In addition to providing for the review of historical vendor manuals, the Vendor Manuals Upgrade Program will establish procedures and be accountable for the review of new vendor manuals or vendor manual revisions prompted by equipment modification, receipt of new vendor information, response to NRC Bulletins, etc. Items envisioned for inclusion in the "on-going" program are:

- 1) The creation of procedures for establishing "periodic" contact with vendors supplying manuals that are applicable to safety-related equipment, to ensure the manual is the most current and up-to-date and is still applicable to installed equipment. This periodic contact is intended to be via formal letter and will provide for the establishment or receipt of periodic vendor information (Service Information Letters, Technical Information Letters, etc.) as deemed necessary. Periodic contact is presently envisioned to be performed annually. Therefore, the implementation of the program for establishing periodic contact will be approximately one year following the Station's acceptance of a reviewed Vendor Technical Manual.

- 2) In the case of future modifications, procedures will be established for the Specification and Procurement of vendor manuals. It is presently envisioned these procedures will also establish guidelines and criteria to accommodate the design review of these same vendor manuals, by designated design engineers, prior to the turnover of vendor technical manuals to the plant at the modification acceptance stage. These procedures are presently being drafted.
- 3) To further accommodate the "on-going" review of station received vendor technical manuals or related information, the station is envisioning an organization consisting of a Document Control Center Supervisor, a Document Control Center clerk, a Technical liaison (information specialist), and system engineers to provide the technical expertise to review new manuals or manual updates for applicability.

The Vendor Manuals Upgrade Program contract (historical) reviewers will disseminate, review, and control the on-going receipt of vendor technical information until the appropriate Station manpower exists to implement or perform the necessary functions for maintaining Fort Calhoun Vendor Manuals.

Lastly, it is important to note the interfaces associated with this Vendor Manuals Upgrade Program and the effect each of these interfaces will have on the schedule for complying with the requirements of Generic Letter 83-28, item 2.2.2. Specifically, Generic Letter 83-28 states, "Licensees shall establish, implement, and maintain a continuing program to ensure that vendor information for safety-related components is complete and controlled throughout the life of their plants, AND APPROPRIATELY REFERENCED OR INCORPORATED IN PLANT INSTRUCTIONS AND PROCEDURES." It is not the intent of the Vendor Manuals Upgrade Program to make the determination that vendor manual recommendations are included in plant procedures. Rather, other projects within the OPPD project 1991 will institute measures to ensure vendor manual information is "APPROPRIATELY INCORPORATED" in plant instructions and procedures. By title, the "Procedures Upgrade Program" as well as the "Preventive Maintenance Upgrade Program" are the additional OPPD projects that will be relied upon to evaluate the need for incorporating vendor manual recommendations. Per these efforts, vendor recommendations will be evaluated and incorporated into procedures if necessary. Should vendor recommendations not be incorporated into procedures, it is our present intent to review their applicability and to provide engineering justification for such deviations. Per the Vendor Manuals Upgrade Program existing procedures will be updated to reflect vendor manual REFERENCES as necessary. Therefore, the schedule for complete compliance with the requirements of Generic Letter 83-28, as it pertains to the incorporation or referencing of vendor manual information into plant instructions and procedures, will not be fully implemented until the completion of those related Project 1991 tasks identified above. Presently, the expected completion date for these projects is December 31, 1991.