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

February 26, 1988
LIC-88-137

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

References: 1. Docket No. 50-285
2. Letter from NRC (L. J. Callan) to OPPD (R. L. Andrews) dated January 27, 1988

Gentlemen:

SUBJECT: Response to Notice of Violation
NRC Inspection Report 50-285/87-29

Omaha Public Power District (OPPD) recently received Reference 2, Notice of Violation, issued as a result of the subject inspection report. This report identified two violations. The violations involved the failure to have an adequate post-maintenance testing program for safety-related components and the failure to issue and implement a procedure for surveillance testing of the core exit thermocouple system.

Pursuant to the provisions of 10 CFR Part 2.201, please find attached, OPPD's response to the violations. If you have any questions concerning this matter, please do not hesitate to contact us.

Sincerely,

R. L. Andrews
Division Manager
Nuclear Production

RLA/me

cc: LeBoeuf, Lamb, Leiby & MacRae
R. D. Martin, NRC Regional Administrator
L. J. Callan, NRC Director, Division of Reactor Projects
A. Bournia, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector

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RESPONSE TO NOTICE OF VIOLATION

During an NRC inspection conducted on November 1-30, 1987, violations of NRC requirements were identified. 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. Section 5.8.1 of the Technical Specifications states, in part, that written procedures shall be established, implemented, and maintained that meet or exceed the minimum requirements of Section 5.3 of ANSI 18.7-1972.

Section 5.3.5(3) of ANSI 18.7-1972, which is applicable to all safety-related equipment, requires that maintenance procedures provide instructions for post-maintenance checkout and return to service.

Section 6.2 of the licensee's Quality Assurance Plan states, in part, that post-maintenance testing shall be performed on CQE (safety-related), limited-CQE, and fire-protection equipment.

1. Contrary to the above, Procedure SO-G-17 does not require the technical supervisor to specify post-maintenance testing requirements for all CQE, limited-CQE, and fire-protection equipment. Paragraph 4.3 of this procedure requires post-maintenance testing only for safety-related equipment required to function during accident conditions.

2. Contrary to the above, post-maintenance operability testing was not specified on Maintenance Orders 875166, 875167, and 875183 which were issued for repair of safety-related valves PCV-514A, FCV-532A, and LCV-1173, respectively. These are safety-related valves not required to function during accident conditions.

This is a Severity Level IV violation. (Supplement I)(285/8729-01)

OPPD'S RESPONSE

Reason for the Violation if Admitted

Section 6.2 of the OPPD Quality Assurance Plan does not specifically state that post-maintenance testing shall be performed on CQE, limited-CQE, and fire-protection equipment. However, it could be interpreted to mean that because of the scope of Section 6.2. The process for determining post-maintenance testing requirements is contained in Section 4.3 of Standing Order G-17 (Maintenance Orders). At the time of the violation, G-17 required post-maintenance testing for only that safety-related equipment which performed an accident function. Due to the aforementioned interpretation of the QA Plan, Standing Order G-17 was in conflict with Section 6.2 of the QA Plan.

Corrective Steps Which Have Been Taken and the Results Achieved

Upon notification of this concern by the Resident Inspector, personnel authorized to perform the technical reviews of Maintenance Orders (MO's) were immediately directed to specify post-maintenance testing for all safety-related equipment. Testing was performed on valves PCV-514A, FCV-532A, and LCV-1173, and a revision to Standing Order G-17 was also prepared and submitted to the Plant Review Committee. This change was approved and implemented December 7, 1987.

Attachment (Continued)

Corrective Steps Which Will Be Taken to Avoid Further Violations

OPPD management will develop or revise existing procedures to ensure that future changes to the QAP are reviewed and appropriate changes to affected procedures are implemented. The reviews will also ensure that affected procedures properly interpret the QA Plan and discrepancies will be resolved as appropriate. This procedure will be completed and implemented by June 30, 1988.

Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.

B. Section 5.8.1 of the Technical Specifications states, in part, that procedures shall be established, implemented, and maintained that meet or exceed the requirements of Appendix A to Regulatory Guide 1.33.

Section 8.b of Appendix A to Regulatory Guide 1.33 states, in part, that specific procedures for surveillance tests should be written for each surveillance test listed the the Technical Specifications.

On October 30, 1987, Amendment 110 of the Technical Specifications became effective and established the surveillance requirements for the core exit and heated junction thermocouple instrumentation systems.

Contrary to the above, the Fort Calhoun Station failed to issue and implement procedures for surveillance testing of the core exit and heated junction thermocouple instrumentation systems on October 30, 1987, the date that the Amendment 110 became effective. On November 10, 1987, the NRC inspector notified the licensee that surveillance test procedures had not been implemented. On November 24, 1987, the licensee issued the core exit and heated junction thermocouple instrumentation surveillance procedure and performed testing to verify instrumentation operability.

This is a Severity Level IV violation. (Supplement I)(285/8729-04)

OPPD's Response

The Reason for the Violation If Admitted

Plant personnel were unaware that a Technical Specification amendment was issued until the date it became effective. The amendment was not properly routed to the plant personnel due to an error in correspondence distribution.

Corrective Steps Taken and the Results

On the November 24, 1987, Fort Calhoun Station issued the core exit and heated junction instrumentation surveillance procedures (ST-CET-1 F.1 and ST-HTJC-1 F.1) and performed testing to verify instrumentation operability. Alterations to the surveillance for calibration of the Subcooled Margin Monitors (ST-SMM-1) and to the Master Checklist for Start-up or Trip Recovery (OP-1) were also completed. The implementation and alteration of these procedures ensure full compliance with Technical Specification Amendment 110.

Corrective Steps Which Will Be Taken to Avoid Further Violations

To resolve the generic problem of correspondence control and distribution a review is being performed. The Technical Specification amendment review process is a part of this. Several actions concerning the Technical Specification amendments have been implemented to date.

Within the first week after the issuance of an amendment to Technical Specifications, the plant manager and the other supervisors are notified of the change and receive a copy of the amendment. This provides each supervisor with the knowledge of a change to Technical Specifications that could potentially affect the various procedures used by his/her group. Per Nuclear Production Division Policy/Procedure G-2, the amendment is placed on the Integrated Regulatory Requirement Action Log (RRD). This document is used by licensing to facilitate orderly handling and tracking of industry requirements and OPPD commitments. The amendment is assigned to cognizant personnel who will ensure that the procedural changes required for an amendment to Technical Specifications will be implemented within 3 weeks of the date of issuance. This is within the 30 day time limit that is usually allowed to implement the amendment.

Date When Full Compliance Will Be Achieved

The new procedures and procedure changes that have been implemented ensure full compliance with Technical Specification Amendment 110.

The review of the generic problem of correspondence control and distribution will be completed by April 15, 1988. Recommendations resulting from this review will be addressed as needed.