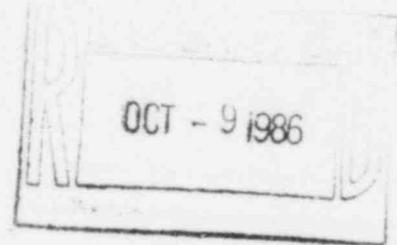


**Omaha Public Power District**  
1623 Harney Omaha, Nebraska 68102-2247  
402/536-4000

October 2, 1986  
LIC-86-505



J. E. Gagliardo, Chief  
Reactor Projects Branch  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Tx. 76011

- References
1. Docket No. 50-285
  2. Inspection Report 50-285/86-21, dated September 2, 1986

Dear Mr. Gagliardo:

Inspection Report 86-21  
Notice of Violation

Omaha Public Power District (OPPD) recently received Reference 2, containing notice of two violations. The violations involved the failure to report a nonfunctional fire barrier and the failure to properly store critical quality equipment (CQE) material. OPPD's response to these violations is attached to this letter.

The attached responses are primarily intended to address the specifics of the violations as cited in the inspection report.

OPPD management is also concerned about the more generic aspects of these violations, as noted in your letter. An evaluation of some possible courses of action to address these concerns is underway. Among options being considered are enhancements to General Employee Training to increase its effectiveness, further use of the Training Hotline process to alert personnel to this sort of concern, and utilization of individual

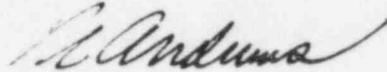
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J. E. Gagliardo  
LIC-86-505  
Page 2

personnel training to address concerns of the type noted. OPPD will notify you within 60 days of the course of action which will be pursued. If you have any questions concerning this response, please do not hesitate to contact us.

Sincerely,



R. L. Andrews  
Division Manager  
Nuclear Production

RLA/DJM/me  
Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Ave., N.W.  
Washington, DC 20036

Mr. D. E. Sells, NRC Project Manager  
Mr. P. H. Harrell, NRC Senior Resident Inspector

## ATTACHMENT

During an NRC inspection conducted on July 1-31, 1986, two violations of NRC requirements were identified. The violations involved the failure to report a nonfunctional fire barrier and the failure to properly store critical quality equipment (CQE) material. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

- a. Criterion XIII of Appendix B to 10 CFR Part 50 requires that measures be established to control storage of material to prevent damage or deterioration.

Section 7.3, "Storage, Shipping, and Handling," of the licensee's Quality Assurance Plan (QAP) has been established to implement the requirements of Criterion XIII.

Contrary to the above, the licensee failed to properly store sacks of boric acid in the plant to prevent possible damage or deterioration. As a result, extraneous material was piled on top of the paper sacks containing boric acid.

This is a Severity Level IV violation (Supplement I.D) (285/8621-01)

- b. Technical Specification (TS) 2.19(7) requires that a nonfunctional fire barrier be restored within 7 days or a written report be prepared and submitted to the NRC within an additional 30 days.

Contrary to the above, the fire barrier between the upper and lower electrical penetration rooms was nonfunctional for greater than 30 days and the licensee failed to prepare and submit a written report to the NRC.

This is a Severity Level V violation (Supplement I.E) (285/8621-02)

Pursuant to the provisions of 10 CFR Part 2.201, Omaha Public Power District is hereby required to submit to this Office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

### OPPD Response to Violation a.

#### (1) Reason for the Violation

OPPD agrees that a violation occurred with the following mitigating circumstances.

10 CFR 50, Appendix B, Criterion XIII states in whole: "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration. When necessary for particular products, special protective environments, such as as inert gas atmosphere, specific moisture content levels, and temperature levels, shall be specified and provided."

Section 7.3 of OPPD's Quality Assurance Plan states, in part: "Levels and methods of storage necessary shall be defined to minimize the possibility of damage or lowering of quality due to corrosion, contamination, deterioration, or physical damage from the time an item is stored upon receipt until the time the item is removed from storage and placed in its final location."

Boric acid is procured by OPPD as a quality component and therefore, is handled as such. It is stored as ANSI N45.2.2 Level C in accordance with plant Standing Order G-22. After the resident inspector brought this matter to the attention of plant management, a temporary CQE storage area was erected in accordance with plant standing orders. Subsequent to this action, boric acid storage was specifically addressed by plant management and it was deemed that boric acid stored in the auxiliary building met the requirements of ANSI N45.2.2, Level C storage. This change was incorporated into the Standing Order on July 10, 1986. Therefore OPPD believes that the intent of 10 CFR 50, Appendix B and OPPD's QA plan was met.

(2) Corrective steps which have been taken and the results achieved.

A review of the present method of storage indicates that a permanent structure would afford more protection and further limit access to the storage area. Since that time, OPPD management has decided that yet a more conservative approach to the storage of boric acid would be to build a cage wall around the storage area and thus, further limit access. OPPD has issued a letter to operations and maintenance personnel to explain to them the status of boric acid as a quality component and that it is stored in conformance with plant Standing Order G-22. Additionally, supervisory tours have been increased in this area and no other anomalies, other than those discovered by the NRC inspector, have been discovered.

(3) Corrective steps taken to avoid further violations.

OPPD will increase the protection of the boric acid storage area by erecting a cage structure in the storage area and further limit access to the area. It should be noted that this conservative action may be changed in the future should any construction projects at the Fort Calhoun Station currently in progress or planned for the future provide better storage locations for boric acid.

(4) The date when full compliance will be achieved.

OPPD is currently in full compliance. The additional measures will be completed by November 15, 1986.

OPPD Response to Violation b.

(1) Reason for the Violation

The fire barrier was made nonfunctional when a removable concrete floor slab was removed to facilitate the installation of modification MR-FC-81-092, "Emergency Exit." At the time that the modification construction package was being approved, it was the understanding of plant staff that the contractor would restore the fire barriers at the end of each working day. Therefore, the only requirements regarding fire barrier operability were for the compensatory measures of verifying fire detector operability in the area and establishing an hourly fire watch patrol for those periods of time when the fire barrier was degraded. Shortly after work started, the plant was informed that the fire barrier could not be restored at the end of each working day and that a fire watch patrol was required around the clock. The fire barrier was inoperable in excess of seven days on May 23, 1986. During the following 30 days, no special report was issued to the NRC. During the month of July, 1986, the resident inspector requested a copy of the special report that was supposed to have been submitted to the NRC regarding the inoperable fire barrier. At that time it was verified that a special report had not been submitted. The plant immediately completed and transmitted the special report to the NRC. The report was not submitted within the 30 day limit due to an oversight by plant staff.

(2) Corrective steps which have been taken and the results achieved.

Upon verifying that a special report had not been submitted within 30 days, a special report was completed and transmitted to the NRC as quickly as possible. A final report was submitted to the NRC on August 12, 1986.

(3) Corrective steps taken to avoid further violations.

Fort Calhoun Station Standing Order G-58, "Fire Barriers," was updated per Procedure Change No. 18029 to explain in detail the reporting requirements regarding fire barrier inoperability. A training hotline was then issued to plant employees notifying them of the changes in the procedure. The procedure utilized by Generating Station Engineering in preparing construction packages that require altering fire barriers (MGS-303) is being changed to include making provisions for reporting extended periods of fire barrier inoperability to Fort Calhoun Station plant staff so that proper NRC notification can be made. The above changes in administrative controls will ensure that the NRC is notified within the 30 day limit specified.

(4) The date when full compliance will be achieved.

OPPD is presently in full compliance. Full compliance was achieved with the submittal of the final revision of the special report on August 12, 1986.