



Omaha Public Power District  
444 South 16th Street East  
Omaha, Nebraska 68102-2247

December 9, 1997  
LIC-97-0150

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 (W. J. Johnson) to OPPD (S. K. Gambhir) dated November 10, 1997

SUBJECT: NRC Inspection Report No. 50-285/97-18, Reply to a Notice of Violation

The subject report transmitted a Notice of Violation (NOV) resulting from an NRC inspection conducted September 14, through October 25, 1997 at the Fort Calhoun Station (FCS). Attached is the Omaha Public Power District (OPPD) response to this NOV.

If you should have any questions, please contact me.

Sincerely,

*James H. Jilly*  
S. K. Gambhir *For*

Division Manager  
Engineering and Operations Support

SKG/ddd

Attachment

c: Winston and Strawn  
E. W. Merschoff, NRC Regional Administrator, Region IV  
L. R. Wharton, NRC Project Manager  
W. C. Walker, NRC Senior Resident Inspector

*IEDI*

9712170494 971205  
PDR ADOCK 05000285  
G PDR



## REPLY TO A NOTICE OF VIOLATION

Omaha Public Power District  
Fort Calhoun Station

Docket: 50-285  
License: DPR-40

During an NRC inspection conducted on September 14, through October 25, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" NUREG 1600, the violation is listed below:

Appendix E of 10 CFR Part 50, Criterion V, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstance and shall be accomplished in accordance with these instructions, procedures, or drawings.

Standing Order SO-M-2, "Preventative Maintenance Program," Revision 24, Step 10.1, states, in part, those preventive maintenance work plans not completed by their due date shall have Form FC-1066 initiated to obtain approval for deferral.

Preventive Maintenance Order 9603504, which involved cleaning and eddy current testing of a spent fuel pool heat exchanger, was scheduled to be completed on November 2, 1996.

Contrary to the above, Preventive Maintenance Order 9603504 was not completed by the due date, and the licensee did not initiate the required documentation to authorize deferral of the preventive maintenance.

This is a Severity Level IV Violation (Supplement I) (285/97018-02)

### 1. The Reason for the Violation

A Preventive Maintenance Order was tasked to perform an eddy current test on the Spent Fuel Pool Heat Exchanger during the 1996 Refueling Outage. This task was removed from the outage scope using the Outage Scope Change/Addition Request process in accordance with the requirements of Standing Order M-104. However, no Preventive Maintenance Program Task Deferral/Administrative Closeout form was completed.

The cause of this event was failure to follow the appropriate procedural process for deferral of preventive maintenance tasks in that the required deferral form, FC-1066, was not completed in accordance with the requirements of Standing Order M-2. A contributing cause was that the Outage Scope Change/Addition Request (OSCAR) process in Standing

Order M-104, Outage Planning and Execution, did not contain a procedural reference to Standing Order M-2, Preventive Maintenance Program, for completion of the Preventive Maintenance Order (PMO) Deferral form, FC-1066.

**2. Corrective Steps Which Have Been Taken and the Results Achieved**

A Preventive Maintenance Program Task Deferral/Administrative Closeout form has been completed and approved for PMO 9603504.

A review of outage PMOs was performed to determine if other tasks were removed from the outage scope without the proper deferral. This review revealed an additional 45 PMOs that required attention.

**3. Corrective Steps Which Will Be Taken to Avoid Further Violations**

The 45 outage PMOs will be evaluated and deferred in accordance with the requirements of Standing Order SO-M-2. This action will be completed by December 31, 1997.

Standing Order SO-M-2 and Standing Order M-104 will be revised to clarify the interface between Outage Scope Change/Addition Request form and the requirements for PMO deferral. These revisions will be completed by January 31, 1998.

**4. Date When Full Compliance Will Be Achieved**

OPPD is currently in full compliance for PMO 9603504 and will be in full compliance for the other 45 outage PMOs by December 31, 1997.