



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

JAN 26 1987

Docket No. 50-285
License No. DRP-40
EA 86-176

Omaha Public Power District
ATTN: R. L. Andrews, Division Manager -
Nuclear Production
1623 Harney Street
Omaha, Nebraska 68102

Gentlemen:

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY
(NRC INSPECTION REPORTS NO. 50-285/85-22 AND NO. 50-285/85-29)

This refers to the Safety Systems Outage Modifications Inspections (SSOMI) conducted of activities authorized by NRC License No. DRP-40 during the periods September 16-20, 30, and October 1-8, 1985 (50-285/85-22), and November 6-8, 18-22, and December 9-17, 1985 (50-285/85-29) at the Fort Calhoun Station. The special inspections identified violations of NRC requirements in the design, installation, and testing of certain modifications at the Fort Calhoun Station. Accordingly, an enforcement conference was conducted in the Region IV office on July 10, 1986 to discuss the apparent violations and other concerns identified during the SSOMI.

Violation I of the enclosed Notice of Violation and Proposed Civil Penalty (Notice) involves a significant violation associated with the modification of the steam admit valve to the turbine-driven auxiliary feedwater pump steam supply system without conducting and documenting a review in accordance with 10 C.F.R. § 50.59. The proposed modification consisted of a change to the common steam admit valve (YCV-1045) from the "fail close" to the "fail open" design mode with the addition of safety-related air accumulator systems for the two individual "fail open" steam supply valves (YCV-1045 A and B). Air accumulators were to provide the capability for remote manual operation of the steam supply valves upon loss of non-safety-related instrument air. Plant personnel, however, only partially completed the modification in March 1980 by changing the steam admit valve to the "fail open" design mode without adding the air accumulators to the steam supply valves. This partially completed modification introduced an unreviewed safety question in that during a steam generator tube rupture incident with concurrent loss of non-safety-related instrument air, the inability to close the steam supply valves would result in an additional fission product release path not previously analyzed in the Updated Safety Analysis Report (USAR). The facility was operated in this unanalyzed condition from March 1980 until the two individual steam supply valves were equipped with safety-related air accumulator operating systems during the 1985 refueling outage.

It is significant that during the period between 1980 and 1985, several organizations within Omaha Public Power District (OPPD) were apparently aware of the partial modification. Further, when a safety evaluation was performed

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on January 15, 1985, it was inappropriately concluded that an unreviewed safety question did not exist when, in fact, one did exist. This violation reveals weaknesses in your program for the review of plant changes and in the administrative controls established to assure that design reviews are properly performed, including safety evaluations performed in accordance with the requirements of 10 C.F.R. § 50.59.

To emphasize the need for improved management attention in the area of 10 C.F.R. § 50.59 reviews, I have been authorized, after consultation with the Director, Office of Inspection and Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Fifty Thousand Dollars (\$50,000) for Violation I described in the enclosed Notice. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 C.F.R. Part 2, Appendix C (1986) (Enforcement Policy), Violation I in the enclosed Notice has been categorized as a Severity Level III violation. The base civil penalty for a Severity Level III violation is \$50,000, and although the escalation and mitigation factors in the Enforcement Policy were considered, no adjustment was deemed appropriate in this case.

Violations in Section II of the enclosed Notice involve additional deficiencies identified in the areas of design control, equipment testing, maintenance procedure adequacy and accuracy, control of special processes, control of material storage, corrective action, and document control. Although these deficiencies were considered as less serious than those described in Violation I and have been categorized as Severity Level IV violations, the numerous deficiencies in the areas of design control and procedural adequacy and adherence demonstrate the need for increased management attention in these areas.

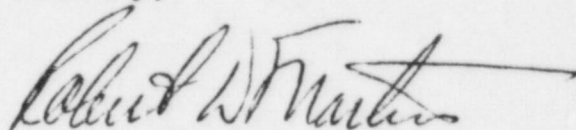
You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. You may reference previous correspondence or discussions which described your actions taken to correct the violations. After reviewing your response to this Notice, including your proposed corrective actions, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

JUN 20 1987

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,



Robert D. Martin
Regional Administrator

Enclosure:
Notice of Violation and
Proposed Imposition of
Civil Penalty

cc w/encl:
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