

FEB 11 1987

In Reply Refer To:
Docket: 50-285/86-03

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

Gentlemen:

Thank you for your letters of May 18, 1986, and January 16, 1987, in response to our letters dated April 18, 1986, and December 19, 1986. We have reviewed your supplemental reply and find it responsive to the concerns raised in our Notice of Violation, but we continue to believe that Violation A in our April 18, 1986, letter to you is a violation as cited. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By
J. E. Gagliardo

J. E. Gagliardo, Chief
Reactor Projects Branch

cc:
W. G. Gates, Manager
Fort Calhoun Station
P. O. Box 399
Fort Calhoun, Nebraska 68023

Harry H. Voigt, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, NW
Washington, DC 20036

Kansas Radiation Control Program Director

Nebraska Radiation Control Program Director

bcc: (see next page)

SRI
PHH:prell:cs
2/6/87

PI: [Signature]
RPM: [Signature]
2/6/87

C:RPB [Signature]
DRHunter
2/6/87

C:RPB [Signature]
JEGagliardo
2/10/87

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Omaha Public Power District

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bcc to DMB (IE01)

bcc distrib. by RIV:

RPB

Resident Inspector

R. D. Martin, RA

R&SPB

Section Chief (RPB/B)

RSB

RIV File

DRS&P

D. Weiss, LFMB (AR-2015)

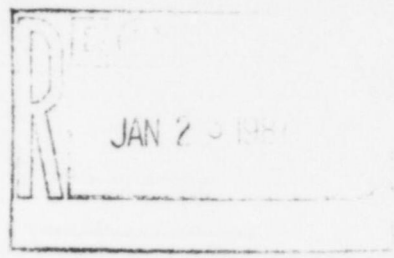
MIS SYSTEM

RSTS Operator

Project Inspector (RPB/B)



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



January 16, 1987
TS-FC-87-22
LIC-87-024

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Inspection Report 86-03 - Notice of Violation

Reference: Docket No. 50-285

Gentlemen:

Omaha Public Power District (OPPD) recently received your letter requesting additional information addressing the portion of Violation 285/8603-01 concerning valves FO-116, FO-117, FO-118 and FO-119. OPPD's response is attached. If OPPD can be of further assistance, please do not hesitate to contact us.

Sincerely,

R. L. Andrews
Division Manager
Nuclear Production

RLA/rh

Attachment

c: U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Mr. P. H. Harrell, NRC Senior Resident Inspector

IC-87/023

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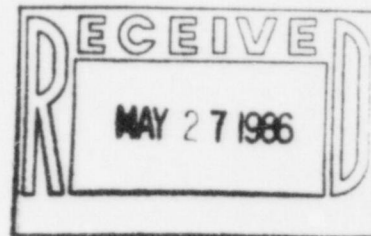
Attachment to Docket: 50-285/86-03

OPPD's response to the NRC's requests for additional information regarding Inspection Report 50-285/86-03, dated December 19, 1986, are as follows:

- a. NRC Request - Do records exist that indicate FO-118 was provided as a Stockham valve by the diesel generator supplier?
- OPPD Response - No.
- b. NRC Request - Do records exist that indicate FO-116, FO-117 and FO-119 were provided as Crane valves by the diesel generator supplier?
- OPPD Response - No.
- c. NRC Request - If the answer to a. and/or b. above is No, do you have records to show that the valves were properly receipt inspected and installed in accordance with approved design changes?
- OPPD Response - No.
- d. NRC Request - If the answer to c. above is No, have you performed an engineering evaluation to verify that the valves installed in this safety-related system can perform their intended safety function?
- OPPD Response - Yes; OPPD has performed an engineering evaluation which concludes that valves FO-116, FO-117, FO-118 and FO-119 will perform their intended safety function.

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

May 18, 1986
LIC-86-236



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

References: 1. Docket No. 50-285
2. Inspection Report 50-285/86-03 dated April 18, 1986.

Dear Mr. Gagliardo:

Inspection Report 86-03
Notice of Violation

Omaha Public Power District (OPPD) recently received Reference 2 containing a notice of violation for the failure to check nonfunctional fire barriers hourly and for the modification of systems without use of an approved procedure. OPPD's responses to these violations are attached to this letter. If you have any questions concerning any of these responses, please do not hesitate to contact us.

Sincerely

A handwritten signature in cursive script that reads "R. L. Andrews".

R. L. Andrews
Division Manager
Nuclear Production

RLA/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

IC-099/86

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ATTACHMENT

"During an NRC inspection conducted during the period February 1-28, 1986, violations of the NRC requirements were identified. The violations involved the failure to check nonfunctional fire barriers hourly and the modification of systems without use of an approved procedure. 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 V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Section 5.1, 'Control of Plant Design and Modifications,' of the OPPD Quality Assurance (QA) Manual and Standing Order G-21, 'Station Modification Control,' have been established to implement requirements of Appendix B and require that modification of equipment be performed in accordance with written procedures.

Contrary to the above, the licensee performed a modification to the fuel oil system for the emergency diesel generator without the use of a written and approved procedure.

This is a Severity Level IV violation (Supplement I.D) (285/8603-01)

- B. Technical Specification 2.19(7) states, in part, 'All penetration fire barriers protecting safety-related areas shall be functional (intact). With a penetration fire barrier nonfunctional, within one hour . . . establish an hourly fire watch patrol.'

Contrary to the above, the hourly fire watch patrol had not been properly established in that on February 11, 1986, the security guard tour (hourly fire watch patrol) had not accomplished and documented the hourly tours of certain portions of the auxiliary building to check two nonfunctional fire barriers, a fire door and a ventilation port.

This is a Severity Level IV violation (Supplement I.E) (285/8603-02).

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 A.

(1) Reason for the Violation If Admitted

The alleged violation involved valve FO-118 which is located on the fuel oil system of emergency diesel generator #2. The discussion of the violation in Appendix A, page 4, of the NRC inspection report letter indicates that, "During a walkdown performed in December 1985, the NRC inspector noted that a valve had been added to the fuel oil system for the emergency diesel generator." When the NRC inspector discussed this with the Plant Engineer, he (the inspector) noted that a "shiny" valve was installed at FO-118 but the other 1/4" valves on the system (sampling, instrument isolation, etc.,) were not as shiny. The shiny valve is a Stockham valve; the others are Crane valves.

The plant personnel who have been interviewed recall that the fuel oil system was supplied with a valve in this location, and a valve had always been there. No evidence was obtained supporting changeout of this valve. Based on this information, OPPD takes exception to the wording, ". . . a valve had been added . . ." because it is inaccurate. Inspection of drawing revisions to the system flow diagram show that the drawing was incorrectly changed for a period of time to indicate that the valve was not installed.

With reference to the NRC inspector's concern that the valve was a different make, a documentation search was performed but no records were found which provided an approved procedure for installation of the Stockham valve. However, the original documents provided by the emergency diesel generator supplier which have been reviewed do not prove that the Stockham valve was not an original installation.

OPPD does not believe that a violation has occurred based on the above information.

(2) Corrective Steps Taken and Results Achieved

OPPD does not believe a violation occurred.

(3) Corrective Steps Which Will Be Taken To Avoid Further Violations

OPPD does not believe a violation occurred.

(4) Date When Full Compliance Will Be Achieved

OPPD is presently in full compliance.

RESPONSE TO B.

(1) Reason for the Violation If Admitted

The violation occurred because of personnel error on the part of members of the Security Force. Several of the guards did not understand the importance of checking all fire barriers on the hourly fire watch patrol list. These guards' fire watch patrol had been interrupted by security alarms, and they had not resumed the patrol after responding to the security alarms.

(2) Corrective Steps Taken and Results Achieved

All members of the Security Force have been instructed on the necessity for checking all fire barriers on the hourly fire watch patrol list. The Officer-In-Charge of each security shift has been made responsible for verifying that each barrier has been checked and that guards have properly logged in on the appropriate Radiation Work Permit when checking fire barriers in the radiation controlled portion of the auxiliary building.

(3) Corrective Steps Which Will Be Taken To Avoid Further Violations

The steps described in (2) above are believed to be adequate to prevent further violations.

(4) Date When Full Compliance Will Be Achieved

OPPD is presently in full compliance.