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

September 15, 1987
LIC-87-628

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

References: 1. Docket No. 50-285
2. Letter from NRC (J. E. Gagliardo) to OPPD (R. L. Andrews) dated August 14, 1987

Gentlemen:

SUBJECT: Inspection Report 50-285/87-16

The subject inspection report identified two violations. These violations involved the failure to follow procedures and failure to submit a special report. Pursuant to the provisions of 10 CFR Part 2.201, please find attached Omaha Public Power District's response to these violations.

Sincerely,

R. L. Andrews
Division Manager
Nuclear Production

RLA/me

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

R. D. Martin, NRC Regional Administrator
A. Bournia, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector

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ATTACHMENT

During an NRC inspection conducted on June 22-26, 1987, violations of NRC requirements were identified. The violations involved the failure to follow procedures and failure to submit a special report. 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:

Violation A. - Failure to Follow Procedures

Technical Specification 5.8.1 requires that "written procedures . . . be established, implemented, and maintained that meet or exceed the minimum requirement of Section 5.1 and 5.3 of ANSI N18.7-1972, and Appendix A of USNRC Regulatory Guide 1.33 . . ." This requirement is emphasized in the FCS Operating Manual Standing Order G-1, which states: "Strict adherence to the provisions of the Standing Orders is mandatory for all personnel."

1. Functional Test Friskers

Standing Order T-13, "Quality Control Program for Chemistry and Radiation Protection Equipment," establishes the minimum schedule for performing calibration and functional checks. Section 5.2.2(2) requires that a functional check of portable survey instruments and friskers be performed daily prior to use.

Contrary to the above, an NRC inspector determined on June 23, 1987, that daily functional checks of friskers, used daily to monitor tools and equipment being removed from the radiologically controlled area, were not being performed.

2. Performance Test Xetex 415B

Procedure FCP-HP-1, "Radiation Detection Equipment Performance Testing," Section IV(4)(a) states the Xetex 415B will be tested at 64 mr for routine operations or 256 mr for outage/major maintenance.

Contrary to the above, the NRC inspector determined on June 20, 1987, that during routine operations the Xetex 415Bs were being performance tested at 256 mr, not 64 mr as required.

This is a Severity Level IV violation. (Supplement IV)(285/8716-01)

OPPD's Response

The Reason for the Violation if Admitted

The violation addressed the failure of personnel to perform or to properly perform function checks for portable survey instruments and integrating/alarming electronic dosimeters. Standing Order (SO) T-13 was reviewed and found to adequately establish the intended function check frequency for portable survey instruments. The cause of this portion of the violation was the failure of Chemical and Radiation Protection supervision to assure communication of SO T-13 requirements and review implementation in the field. Procedure FCP-HP-1,

"Radiation Detection Equipment Performance Testing", was reviewed. While the function check requirement for integrating/alarming dosimeters was simply stated, the requirement for selected function check doses was found to be inconsistent with both known instruments linear reliability and the field necessity of using varying alarm setpoints. The reasons for this portion of the violation were inadequate Chemical and Radiation Protection supervisory control of the function check process, and a function check procedure that made procedural compliance by the technicians difficult to achieve.

The Corrective Steps That Have Been Taken and the Results Achieved

Written direction to Health Physics (HP) technicians regarding the function check requirements for portable survey instruments used to clear items for unconditional release from the radiation controlled area was provided through an entry made in the health physics log book by the HP coordinator on June 26, 1987. A letter of training, FC-C-25-287 was distributed to Chemical and Radiation Protection personnel on September 11, 1987 to assure emphasis of SO T-13 requirements in initial and requalification training for future technicians. Function checking of integrating/alarming electronic dosimeters at 64 mR was resumed June 21, 1987. Procedure FCP-HP-1 was changed September 10, 1987 to assure consistency of the function check requirement with the calibration procedure and operational practice through establishment of 64 mR as a function check alarm point for all station daily limits. No problems have been observed in this area since the June corrective actions were taken.

The Corrective Steps That Will be Taken to Avoid Further Violations

No further steps are planned.

The Date When Full Compliance will be Achieved.

OPPD is currently in full compliance.

Violation B - Failure to Submit Special Report

Technical Specification 2.21 states that post-accident instrumentation shall be operable as provided in Table 2-10, and if the required instrumentation is not operable, then the appropriate action specified in Table 2-10 shall be taken. In Table 2-10, Item 2, Wide Range Noble Gas Stack Monitor, RE-063L, RE-063M, and RE-063H, requires a minimum of one channel for each range to be operational and if the inoperable channels are not returned to operational status the licensee is to prepare and submit a special report to the Commission within 14 days outlining action taken, cause of inoperability, plans, and schedules for restoring the system to operable status.

Contrary to the above, the NRC inspector determined on June 23, 1987, that the three channels of the Wide Range Noble Gas Stack Monitor, RE-063L, RE-063M, and RE-063H had been inoperable since May 15, 1987, and that a special report had not been submitted to the Commission.

This is a Severity Level V violation. (Supplement I)(285/8716-02)

OPPD's Response

Reason for the Violation if Admitted

The special report required by Technical Specification 2.21 was not submitted within fourteen days because licensed operators who were aware that the monitor was out of service and Instrument and Control personnel and Chemistry personnel involved with the monitor calibration did not track the progress of the Limiting Condition for Operation. Therefore, the need for the special report was not realized.

The Corrective Steps Taken and the Results Achieved

Licensee Event Report 87-023 was submitted for this event on July 27, 1987. The LER documented that procedure OI-RC-3 (Reactor Coolant System Startup) had been revised to include a prerequisite that the requirements of Technical Specification 2.21 be met. The LER stated that a memo was sent from the Supervisor - Operations to operations department personnel stressing the need to comply with LCO's which require a report to be sent to the NRC. The special report required by Technical Specification 2.21 was prepared and sent to the NRC on August 7, 1987. It noted that RM-063L and RM-063M, were in service on July 20, 1987 and that RM-063H is expected to be in service by September 30, 1987.

The Corrective Steps That Will be Taken to Avoid Further Violations

The actions taken are expected to avoid further violations of this type.

The Date When Full Compliance Will be Achieved

OPPD is currently in full compliance.