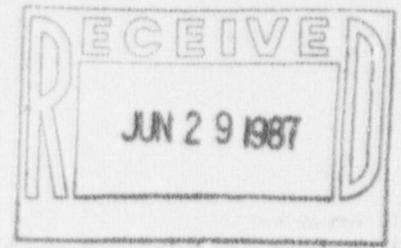


Omaha Public Power District  
1623 Harney Omaha, Nebraska 68102-2247  
402/536-4000



June 26, 1987  
LIC-87-452

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. Letter NRC (J. E. Gagliardo) to OPPD (R. L. Andrews) dated  
May 27, 1987

Dear Mr. Gagliardo:

SUBJECT: Inspection Report 50-285/87-10

The subject inspection report identified one deviation and three violations. The deviation involved the failure to record an overdue surveillance test on the shift turnover log. The violations involved failure to establish a fire watch, failure to maintain containment isolation and failure to establish adequate procedures for determining local containment leak rates. Pursuant to the provisions of 10 CFR Part 2.201, please find attached the Omaha Public Power District's responses to these violations and deviation.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. L. Andrews".

R. L. Andrews  
Division Manager  
Nuclear Production

RLA:рге

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

Mr. R. D. Martin, Regional Administrator  
Mr. P. H. Harrell, NRC Senior Resident Inspector

8707070485 870626  
PDR ADCK 05000285  
Q PDR

IC-87/187  
45 5124

IE01  
11

## ATTACHMENT 1

During an NRC inspection conducted on April 1-30, 1987, violations of NRC requirements were identified. The violations involved failure to establish containment integrity during refueling operations, failure to establish a fire watch in accordance with Technical Specification (TS) requirements, and failure to establish and implement the procedure for leak rate testing of containment isolation valves. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the violations are listed below:

### VIOLATION A

Section (1) of TS 2.8 states, in part, that during any refueling operation, all automatic containment isolation valves shall be operable or at least one valve in each line shall be closed.

Contrary to the above, on April 9, 1987, while the plant was in refueling operations, the NRC inspector noted that automatic containment isolation valves (HCV-483A and HCV-438C) for component cooling water (CCW) supply and return to the reactor coolant pumps were inoperable and the redundant CCW automatic containment isolation valves (HCV-438B and HCV-438D) in the CCW lines were not closed.

This is a Severity Level IV violation. (Supplement I)(285/8710-06)

### GPPD'S RESPONSE

#### The Reason for the Violation if Admitted

To meet the TS requirements for containment isolation during refueling operations, containment penetrations are aligned per Operating Instruction OI-CO-4. After OI-CO-4 was completed, Surveillance Test ST-DC-3 was performed on April 8, 1987. During ST-DC-3, the 125V DC buses are deenergized which permits components to go to their fail position. HCV-438A/B/C/D are suspected to have failed open during the performance of ST-DC-3. The CCW supply and return to the reactor coolant pumps is a closed system which would not permit release of radioactivity from the containment in its "modified" integrity even with the valves open.

#### The Corrective Steps Which Have Been Taken and the Results Achieved

Valves HCV-438B/D were immediately closed restoring containment integrity per Technical Specifications for refueling operations.

#### The Corrective Steps Which Will Be Taken to Avoid Further Violations

To prevent performance of ST-DC-3 from causing this problem in the future, (1) steps will be added to check for repositioned components, and (2) a prerequisite will be added that ST-DC-3 cannot be performed during the time when refueling containment integrity is required.

Containment isolation valves which fail open and/or are in closed systems will be reviewed along with TS 2.8(1) for applicability to be used for containment isolation during refueling operations when only a barrier against radioactivity is needed and not a barrier against design accident pressure.

#### The Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.

#### VIOLATION B

TS 5.8.1 states, in part, that written procedures shall be established, implemented, and maintained that meet the minimum requirement of Regulatory Guide 1.33.

Section 8.b of Regulatory Guide 1.33 states, in part, that containment local leak detection tests be covered by written procedures.

Contrary to the above, the NRC inspector discovered, on April 7, 1987, that the licensee had failed to properly establish a procedure for local leak detection tests in that Procedure ST-CONT-3 did not provide adequate instructions for the testing performed. In addition, the licensee failed to properly implement the instructions for local leak detection in that the instructions provided in Procedure ST-CONT-3 were not followed by the technicians performing the work.

This is a Severity Level IV violation. (Supplement I)(285/8710-07)

#### OPPD'S RESPONSE

##### Reason for the Violation if Admitted

The reason for the violation was discrepancies, inconsistencies and ambiguities in the test procedure. OPPD believes that the technician understood intent of the test, although a verbatim compliance with the test would have precluded his being able to actually perform the test in some cases.

##### Corrective Steps Which Have Been Taken and the Results Achieved

The discrepancies discussed in the inspection report were reviewed and necessary procedure changes accomplished. In those cases where review indicated that an invalid test may have been previously performed, a retest was conducted.

##### Corrective Steps Which Will Be Taken to Avoid Future Violations

Procedure ST-CONT-3 will be reviewed and upgraded as necessary prior to its next use. A certified leak rate training testing program for training on "B" and "C" leak rate testing will be implemented. This program will be successfully completed for each technician performing leak rate tests prior

to their next use of ST-CONT-3. The importance of procedural compliance will be re-emphasized to OPPD personnel. OPPD does have a policy (Standing Order G-7) which requires mandatory compliance with the Operating Manual.

#### Date When Full Compliance Will Be Achieved

Procedural deficiencies and verbatim compliance problems noted for ST-CONT-3 did not adversely affect the quality or accuracy of the testing. The ST-CONT-3 leak rate test procedure will be upgraded as necessary during the current operating cycle, and the upgraded training program will be implemented before the next refueling outage. OPPD is currently in full compliance.

#### VIOLATION C

TS 2.19(7) states, in part, that all fire barriers protecting safety-related areas shall be functional. With a penetration fire barrier nonfunctional, within one hour, either establish a continuous fire watch on at least one side of the affected penetration, or verify the operability of fire detectors on at least one side of the penetration and establish an hourly fire watch patrol.

Contrary to the above, on April 1, 1987, fire barriers for the emergency diesel generator rooms were nonfunctional for approximately 2 days, but neither a continuous nor an hourly fire watch patrol had been established.

This is a Severity Level V violation. (Supplement I)(285/8710-01)

#### OPPD'S RESPONSE

##### The Reason for the Violation if Admitted

A review of the daily fire door logs showed that the doors for the emergency diesel generator rooms were open intermittently for the time period in question (March 31-April 2, 1987). No documentation on the FC-1006 form (hourly fire watch patrol log) exists to support that a fire watch was posted for those periods in excess of one hour. Interviews with maintenance personnel working in the area concluded that they were acting as their own fire watch without notifying Security or Operations personnel. Standing Order O-38, "Firewatch Duties and Turnover Procedures", does not specifically require notification of Operations and/or Security. The hoses were removed from the doorways at the end of the workday. However, the hose through the fire damper was not removed at the end of the workday and therefore should have been subject to an hourly fire watch for the four hour period (approximately) between working shifts.

##### The Corrective Steps Which Have Been Taken and the Results Achieved

Upon being informed of the situation, the hoses were removed and the fire barriers were restored.

The Corrective Steps Which Will Be Taken to Avoid Further Violations

Fort Calhoun Station Site Security Procedure SCP-14, "Patrol Procedures", will be updated so that required action on fire door alarms requires notification of the Shift Supervisor and documentation on both the FC-37, "Daily Fire Door Log", and the FC-1006, "Hourly Firewatch Patrol Log", of the name of the individual acting as fire watch. Fort Calhoun Station Standing Order O-38, "Firewatch Duties and Turnover Procedures", will be updated to require notification of Operations and/or Security when a fire barrier is inoperable. As an interim measure, to provide enhanced awareness among personnel prior to implementation of these changes, a memo is being distributed to all personnel with unescorted access to Fort Calhoun Station emphasizing their role in the Station fire protection program.

The Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.

## ATTACHMENT 2

Based on the results of an NRC inspection conducted on April 1-30, 1987, a deviation of your commitments made to the NRC was identified. The deviation consisted of the failure to log surveillance tests on the shift turnover log when not completed as scheduled. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the deviation is listed below:

On January 13, 1987, the licensee issued Licensee Event Report (LER) 86-05 that described an event where the surveillance test frequency for exercising the control element assemblies every two weeks was exceeded. The frequency was exceeded due to plant conditions prohibiting performance of the test. The licensee committed in the LER to enter any surveillance tests not performed when scheduled on the shift turnover log.

In deviation from the above, on April 2, 1987, the licensee failed to perform a surveillance on the control room ventilation due to plant conditions, and did not enter the surveillance test on the shift turnover log. Administrative controls in place on April 2, at the time of the deviation, did not require a shift turnover log entry to be made. (285/8710-02)

### OPPD'S RESPONSE

#### The Reason for the Deviation if Admitted

The failure to log the Operations surveillance test as overdue on the shift turnover log and subsequently perform it was due to the shift turnover log not being required when the reactor coolant temperature was below 300°F. When the commitment was made in LER-86-05, this inconsistency was overlooked.

#### The Corrective Steps Which Have Been Taken and the Results Achieved

The shift turnover log was instated for all modes of plant operation effective April 29, 1987. Operations personnel were issued a memo clarifying the revised practice. Operations personnel were also issued a reminder on the proper method of handling surveillance tests which cannot be completed as scheduled. Since April 29, 1987, a revised turnover log has been developed, reviewed and issued. This turnover log is for use during conditions when the reactor coolant system temperature is below 300°F.

#### The Corrective Steps Which Will Be Taken to Avoid Further Deviations

OPPD believes that requiring a turnover log during shutdown will help preclude further deviations. Additionally, greater care will be taken in making future commitments to assure the actions are appropriate for all modes of operation or appropriate clarifications to the commitment are made.

#### The Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.