

**Omaha Public Power District**

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

June 15, 1989  
LIC-89-562

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 (G. M. Holahan) to OPPD (K. J. Morris) dated February 9, 1989
  3. Letter from NRC (L. J. Callan) to OPPD (K. J. Morris) dated March 17, 1989
  4. Letter from OPPD (K. J. Morris) to NRC (R. D. Martin) dated April 5, 1989 (LIC-89-335)
  5. Letter from OPPD (K. J. Morris) to NRC (Document Control Desk) dated April 30, 1989 (LIC-89-349)

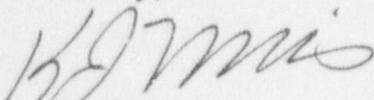
Gentlemen:

SUBJECT: Response to NRC Questions Resulting From Operational Safety Team Inspection (OSTI)

Omaha Public Power District (OPPD) submitted Reference 5 in response to the Notice of Violation included in Reference 3. The violations and unresolved items were derived from the Operational Safety Team Inspection (OSTI) Report, which was received in Reference 2. Upon NRC reviewing OPPD's response included in Reference 5, a telephone conversation was conducted between members of OPPD and NRC Region IV staff on May 10, 1989. This conversation resulted in several questions being presented by NRC staff to OPPD. An Attachment includes the questions presented and answers submitted in support of Reference 5.

If you should have any questions, please do not hesitate to contact us.

Sincerely,



K. J. Morris  
Division Manager  
Nuclear Operations

KJM/jak

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PDR ADOCK 05000285  
Q PNU

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae  
T. E. Murley, NRC Director, Nuclear Reactor Regulation  
R. D. Martin, NRC Regional Administrator  
A. Bournia, NRC Project Manager  
P. H. Harrell, NRC Senior Resident Inspector

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Attachment

NRC QUESTIONS ON OPPD'S  
OSTI VIOLATION RESPONSE

**B.4 Does Standing Order O-29 Revision 10 address guidance on when and how to initiate an On The Spot Change (OTSC)?**

Response:

No, Standing Order G-30 "Setpoint/Procedure Changes" provides the guidance to process an OTSC. Standing Order O-29 addresses the requirement for verbatim compliance with procedures and provides the guidelines for procedure deviation during emergency and abnormal conditions. If, during the normal course of performing a procedure, an individual encounters a problem with complying with a procedure, then Standing Order G-30 provides the specific guidance for processing a temporary OTSC as well as permanent procedure changes. A briefing was conducted by the Plant Manager to numerous Shift Supervisors and other operations personnel on the overall importance of procedural compliance as it pertains to operations. Minutes of this session will be distributed to the non-attending operators.

**B.5 Does the System Engineer approve the use of non-CQE parts in Certified Quality Equipment (CQE) components prior to the implementation of the Maintenance Order (MO)?**

Response:

No, the System Engineer performs an independent technical review of the MO. Prior to implementation of the MO, Procurement Engineering would specify the acceptability of non-CQE part usage in a CQE component.

**Is this a wide spread problem? Are there other cases where the purchase order number information is left blank on CQE MOs.?**

Response:

No, indications reveal that this is not a widespread problem. QA/QC reviews each CQE MO's for completeness as part of the post work review process. There have been some other cases where P.O. numbers are not listed for non-CQE parts. However, this was considered acceptable because non-CQE parts generally do not have P.O. numbers and the current revision of G-17 "Maintenance Orders" does not require P.O. numbers to be listed for non-CQE parts. It should be noted that at present, Standing Order M-101 "Work Control" and Procedure G-17 "Maintenance Order" are both in effect.

**Do individuals know they have to enter the Purchase Order (P.O.) number for all parts used in a CQE component (i.e. even for non-CQE parts acceptable for use in a CQE component)?**

Response:

Yes, individuals know they must enter the P.O. number for CQE parts, however, OPPD does not required documentation regarding P.O. numbers for non-CQE parts. This is in accordance with the current revision of G-17 "Maintenance Orders". The non-CQE part used for M.O. 884163 was borrowed from another breaker and therefore had no P.O. documentation. Additional

guidance was issued to the craftsman concerning what documentation is required when an approved non-CQE part is used in a CQE component. This guidance was issued in a memo on May 17, 1989, and will remain in effect until procedure G-17 "Maintenance Orders" is replaced with the new procedure M-101 "Work Control". At present, both Standing Order M-101 "Work Control" and Procedure G-17 "Maintenance Orders" are both in effect.

**Why is there a delay to revise the Standing Order until June 30, 1989 and what is being done in the interim?**

Response:

Standing Order M-101 "Work Control" which replaces G-17 was implemented on 5/23/89. At present, both Standing Order M-101 "Work Control" and Procedure G-17 "Maintenance Orders" are both in effect. A memo was issued on May 17, 1989 to the craftsmen which provided interim guidance as to proper documentation requirements.

**B.6 Is properly locating the vibration test probe a problem on other pumps? Was this also a problem in Inspection Report 88-26?**

Response:

The problem is unique to the Raw Water pumps because the design is such that the stuffing box corrodes due to controlled packing leakoff, which tends to leach/remove the markings. This does not occur with other IST pumps. The technicians performing the vibration tests are very familiar with where to place the probes; however, because of the procedure compliance effort, the need for identification of probe placement if markings are not visible has been established. A change to procedure #ST-ISI-RW-3 to clarify position of probe was submitted on 5/23/89 to provide clarification to the mechanic and will be approved for use on or before 6/30/89.

Enhancements (e.g., drawing, procedures guidance, etc) in this area are being implemented to provide for monitoring point reidentification.

**How is the permanent fix to be implemented?**

Response:

Procedure changes are being accomplished to provide guidance which will identify the monitoring point if the marking is not visible. In the interim, a memorandum was issued to give specific guidance to craftsmen until procedure changes had taken place.

There is action underway to permanently mark safety-related pumps required to be vibration tested. This activity will be completed on or before the 1990 refueling outage.

**D.1 Why doesn't OPPD correct the known defect in the procedure now rather than wait for the Procedure Upgrade Project?**

Response:

Since the next time the breakers will be PM'd is the 1990 refueling outage, the Project 1991 upgrade would, by its schedule, upgrade the procedure before it would be needed. If needed prior to this time, the procedure will be upgraded prior to use.

**Is this an isolated case or are there other breakers which were not tested?**

Response:

It is not known at this time if this was an isolated case. However, the verification and validation effort performed as part of the Procedures Upgrade Project will provide the necessary level of review to ensure that the breakers are properly included in the PM procedure. Maintenance will review this condition to ensure that every safety-related breaker has been properly tested. This activity will be completed on or before the 1990 refueling outage.

**D.2 Are the other Bettis Operators tested properly?**

Response:

Yes. Other Bettis operators, as well as other types of air operators, are tested properly in that the air is actually failed to the operator per the requirements of ASME Section XI Subsection IWV 3415. This is usually accomplished by use of the control switch which allows a solenoid valve to vent the air from either the top or bottom of the operator. The vent path will depend on whether the valve fails open or closed. The difference was based on design in that this valve operates when the pump starts. In the example given in the OSTI report, the procedure was rushed through, did not have an adequate technical review and was not walked down. The fix was to delete this procedure and resurrect the old one. Formal control on ensuring adequate reviews, walkdowns, etc. are in place to prevent a situation like this from occurring again.

**E. What is OPPD doing in the interim to verify Tech Spec valve time limits?**

Response:

The valve stroke time limits as presently stated in the ISI Pump and Valve Surveillance Tests are within the Tech Spec limits as previously determined by Engineering and vendor evaluation. A review is presently being performed by Design Engineering to accomplish the following:

- a. Establish and document a design basis for valve stroke times.
- b. Establish and document a practical stroke time based on Safety Analysis, Engineering evaluations, and the actual stroke time.
- c. Verify that the current maximum stroke time for the Surveillance Tests have a basis in the Safety Analysis and that there is an adequate safety margin.

In the interim, OPPD will perform the test in accordance with specific procedures, in general by an operator initiating the valve function from the switch and another operator remotely timing the valve stroke. We recognize a deficient condition in our program in that it fails to consistently document the operability of the position indicating lights. However, from existing procedures and training, we are assured that the lights work by observation of operator initiating the switch and the valve strokes in the prescribed time is measured locally from solenoid pickup (or motor start) to end of stroke. Further evaluation is being performed in this area to ensure compliance with the ASME Code until issuance of the revised procedure scheduled for November 15, 1989.

**F.1 After November 15, 1989, when only remote indication is used for stroke timing, will ASME requirements be met?**

Response:

Yes. The stroke timing will be accomplished by timing the valve from initiation of the actuating signal (moving the control switch) to the end of the actuating cycle (as indicated by remote lights) per the requirements of ASME Section XI, Subarticle IWV-3413(a). The remote indicating lights will be tested and verified to be operating properly per the requirements of ASME Section XI, Subarticle IWV-3300.

**F.2 What procedure was changed which lowered the threshold definition of significant deficiencies?**

Response:

Quality Assurance & Quality Control Department Procedure, QDP-17, Rev. 8 "Control of Deficiencies and Corrective Action", was revised to lower the threshold of significant deficiencies and more clearly define the necessary components of a significant deficiency.

**What are the specific Safety Enhancement Program Reference Numbers that address the identified concerns on the corrective action plan?**

Response:

OPPD has determined that the overall improvements brought about by the Safety Enhancement Program will address the concerns that were noted in the OSTI Report Section 2.5. As discussed in the response, a revision to QDP-17 "Control of Deficiencies and Corrective Action" has been approved which will address the specific concerns regarding Operational Safety Assessment incorporation into the corrective action program.

The following specific SEP References are examples of how the overall enhancements in plant operation and safety related procedures will result in a more effective and improved corrective action program:

- SEP Ref. No. 44 Procedural Compliance effort
- SEP Ref. No. 48 Procedures Upgrade Project
- SEP Ref. No. 60 Surveillance Test Program controls improvement
- SEP Ref. No. 20 QA Audit and Surveillance Program enhancements
- SEP Ref. No. 41 Implement a Preventive Maintenance Program

- SEP Ref. No. 35 Establish post-maintenance testing requirement criteria
- SEP Ref. No. 21 Develop a Safety System Functional Inspection Program
- SEP Ref. No. 10 Implementation of Trending and Root Cause Analysis Program
- SEP Ref. No. 22 Increased Field Supervisory activity
- SEP Ref. No. 62 Establish interim System Engineers
- SEP Ref. No. 63 Vendor Manual Upgrade Project

Prior to the revision of implementing procedures in January 1990, what interim action does OPPD plan regarding Operational Safety assessment?

Response:

A change to QDP-17 has been initiated requiring addressees of deficiencies to provide an operational safety assessment when responding to deficiencies. In addition to this change, the operational safety assessment requirement will be noted in an attachment which is included on newly issued deficiency reports. These two interim actions will ensure that operational safety assessments are conducted prior to the revision of the Quality Assurance Plan section pertaining to corrective action.

UNR 88201-04

**What was the weakness in the procedure that contributed to the personnel error?**

Response:

The weakness in Standing Order O-25 "Temporary Modification Control " which was in effect at the time of this incident was that different individuals would have varying degrees of responsibility for initiation, review and preparation, logging and preliminary approval, implementation, post-implementation review and approval and restoration. The old procedure had the potential for poor communication and misunderstanding between the different individuals involved. It was this inherent weakness that resulted in the inaccurate log entries due to personal error. The current Revision 28 of S.O. O-25 has improved this process by using the System Engineer as the responsible individual with clearly defined personal accountability to ensure proper temporary modification processing.

UNR 88201-06

**Was OPPD outside a Tech Spec LCO for the inoperable Steam Generator Blowdown Radiation Monitors?**

Response:

Tech Spec 2.9.1e is governing. It states, in part, that if both radiation monitors are inoperable, steam generator liquid release may continue provided appropriate grab samples are analyzed for the principal gamma emitters at a sensitivity of  $5.0E-07$  micro curies per ml and recorded at least daily when the specific activity of the sample is less than or equal to 0.01 micro curies per gram dose equivalent I-131. During the time from September 29 through October 2, 1988, when both temporary modifications were in effect, the Technical Specification was complied with. On October 2, the plant entered mode 4. At that time the monitors were jumpered per OI-FW-6 "Draining of the Steam Generators."

UNR 88201-18

**Was the control room indication for valves HCV-1107B and HCV-1108B specifically tested?**

Response:

Valves HCV-1107B and HCV-1108B were tested in January and April, 1989 per ST-ISI-FW-1 "Feedwater Valves In-Service Testing." Even though ST-ISI-FW-1 does not have a specific checkoff for control room indicating lights, operators through training would recognize an abnormal condition. If, after actuating the control switch, the operator does not observe the close/open indicator lights change, then an investigation will be made to determine the cause of the problem (i.e., burned out bulb, failed position indicator switch, etc).

For Open Items 88201-11, -12, -14 and -20, what is the currently scheduled completion dates?

OI 88201-11 Electrical Safety and Electrical Safety Training.

Response: J. K. Gasper

Is currently scheduled for completion by 12/31/89.

OI 88201-12 Clearance procedure regarding use of Danger Tags.

Response: D. R. Trausch

Is currently scheduled for completion by 9/30/89.

OI 88201-14 Improve QC inspections guidance for CQE component repair and modification.

Response: W. W. Orr

Is currently scheduled for completion by 11/15/89

OI 88201-20 Concerns related to the adequacy of the penetration test rig.

Response: K. A. Miller

Is currently scheduled for completion by 7/31/89