

Omaha Public Power District
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402/536-4000

June 15, 1989
LIC-89-590

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 (L. J. Callan) to OPPD (K. J. Morris) dated November 7, 1988
 3. Letter from OPPD (K. J. Morris) to NRC (Document Control Desk) dated December 9, 1988 (LIC-88-1089)
 4. Letter from NRC (L. J. Callan) to OPPD (K. J. Morris) dated January 12, 1989
 5. Letter from OPPD (K. J. Morris) to NRC (Document Control Desk) dated February 13, 1989 (LIC-89-179)
 6. Letter from OPPD (K. J. Morris) to NRC (Document Control Desk) dated May 1, 1989 (LIC-89-433)

Gentlemen:

SUBJECT: Request for Additional Information Concerning Clarification of Response to Notice of Violation 285/88-37-01

Omaha Public Power District (OPPD) responded to Notice of Violation 285/88-37-01, Failure to Maintain Traceability of Measuring and Test Equipment (M&TE) in Reference 3. Reference 4 requested additional information needed to clarify our response. As stated in Reference 3, our initial response, OPPD based the conclusion that the conditions identified by the inspector were isolated events. This conclusion was based on prior reviews and interviews with individuals involved in use of M&TE. OPPD had no evidence to the contrary at that time. In Reference 5, OPPD committed to the review of 50 Surveillance Tests (STs) conducted between January 1988 and October 1988 to verify that test equipment used was properly calibrated and recorded in the Instrument and Control (I&C) shop logs, and to confirm that the cases identified were isolated.

As stated in Reference 6, OPPD completed its initial review of Surveillance Test (STs) and determined that contrary to our initial indications, this was not an isolated case and additional measures were needed to ensure traceability of M&TE.

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Reference 6 outlined a review plan to determine the scope of the problem and stated that it would be used as a basis for defining permanent corrective actions to prevent recurrence. This plan consisted of:

- A. Review additional STs
- B. Review M&TE calibration records
- C. Review M&TE Deficiency Reports
- D. Review M&TE Procedures
- E. Conduct interviews with Technicians from the I&C group

A comparative review of I&C STs against the M&TE usage log for the period between January 1, 1988 and October 31, 1988 has been completed. The results indicate that the M&TE usage log has not been routinely completed as directed by Standing Order M-28 "Calibration of Test Equipment." Further, the calibration records and deficiency reports have been compared against the M&TE usage log to identify STs which may have been performed with questionable M&TE. Of the comparisons made, there have been no instances identified where deficient M&TE was used on STs; therefore, the STs were measured in an acceptable method.

The M&TE calibration procedures have been reviewed and other than stated above, there were no technical deficiencies identified. Interviews conducted with the I&C Technicians indicated that personnel were aware of the procedural requirements. However, due to the lack of rigid enforcement of M&TE procedural controls, personnel failed to comply with the requirement outlined in the M&TE calibration procedure. This was addressed by establishing a fulltime position responsible for issuing M&TE as discussed in Reference 6 and will be further strengthened by accomplishment of permanent corrective actions identified below.

Additional corrective actions which OPPD will implement to prevent recurrence are:

1. Revise Standing Order M-28 "Calibration of Test Equipment" to include:
 - a. Clarification of the requirements for issuance and control of M&TE. This will include the requirement to have all M&TE equipment used for critical measurements checked out from the M&TE lab.
 - b. Establish a procedural requirement to have M&TE deficiency reports reviewed within 30 days to expedite the identification of instruments which were tested or calibrated by M&TE which required calibration adjustments.
 - c. Require that M&TE equipment used for critical measurements for a particular work activity at Fort Calhoun Station be logged in the "usage log" maintained by personnel assigned to the M&TE issue area. If the M&TE is to be used on a different job then it will be required to be reentered in the "usage log."

- d. Establish controls for immediate corrective action when M&TE is identified as defective. This will be accomplished by placing the defective equipment in a holding area separate from the issue area and placing a reject tag on the defective equipment.
 - e. Define critical measurements and incorporate into Standing Order M-28.
2. Establish a finite M&TE issue area.
 3. Recall M&TE, which is maintained by the Instrument and Control and Electrical/Maintenance Craft/ departments, to the central issue area.
 4. Train personnel who utilize M&TE in the requirements of the revised Standing Order M-28 "Calibration of Test Equipment", the requirement for adherence to procedures, and the reason for maintenance of an M&TE program."
 5. Current outstanding deficiency reports dealing with M&TE will be reviewed by October 15, 1989. This completion date was established based on the length of time these reports have been outstanding.

Reference 6 also addressed compensatory action OPPD had instituted pending the outcome of this review. These compensatory actions have been implemented and will remain in place pending implementation of additional corrective action. Additional corrective action will be completed by August 15, 1989.

The items committed to in Reference 5 are on schedule for implementation by July 31, 1989. These items are:

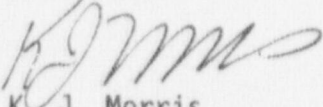
1. An individual will be designated to control issuance of Measure and Test Equipment (M&TE). This individual will be responsible for maintaining the I&C shop log to document the release and return of test equipment, as well as maintaining equipment calibration records and associated documentation.
2. Controlled access to calibrated test equipment will be established by July 31, 1989. This will restrict access to ensure that each piece of equipment is properly released to service and returned from service. This has been administratively established by the Supervisor - Instrument and Control and will be proceduralized by the date noted above.
3. An improved system for recording test equipment used for M&TE functions will be developed and implemented by July 31, 1989. This will aid in maintaining traceability of test equipment.

Item 3 has been revised to specify test equipment used for M&TE functions not just surveillance tests which was what had been committed to in Reference 6.

In conclusion, OPPD has determined that the action taken in Reference 6 in conjunction with the additional corrective actions included in this letter, will correct the conditions reported in Notice of Violation 285/88-37-01.

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

Sincerely,



K. J. Morris
Division Manager
Nuclear Operations

KJM/jak

c: LeBoeuf, Lamb, Leiby & MacRae
R. D. Martin, NRC Regional Administrator
A. Bournia, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector