

AUG 7 1989

In Reply Refer To:
Docket: 50-285/89-22

Omaha Public Power District
ATTN: Kenneth J. Morris, Division Manager
Nuclear Operations
444 South 16th Street Mall
Omaha, Nebraska 68102-2247

Gentlemen:

Thank you for your letter of July 20, 1989, in response to our letter and Notice of Violation dated June 20, 1989. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. 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:
Thomas P. Gwynn

James L. Milhoan, Director
Division of Reactor Projects

cc:
Fort Calhoun Station
ATTN: G. R. Peterson, Manager
P.O. Box 399
Fort Calhoun, Nebraska 68023

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

Nebraska Radiation Control Program Director

bcc to DMB (IE01)

bcc distrib. by RIV:
R. D. Martin, RA
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8908170474 890807
PDR ADDCK 05000285
G PNU

RPB-DRSS
MIS System
DRP
Project Engineer (DRP/B)
DRS
RRI

RIV:DRP/BV
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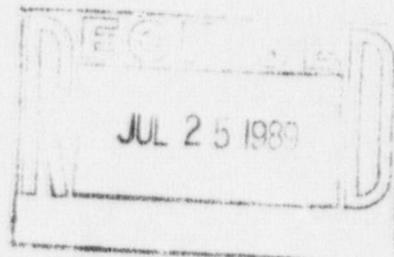
C:DRP/B
TFWestern
8/3/89

D:DRP
JLMilhoan
8/7/89

IE01
1/1

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

July 20, 1989
LIC-89-690



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 (J. L. Milhoan) to OPPD (K. J. Morris) dated
June 20, 1989

Gentlemen:

SUBJECT: Response to Notice of Violation (Inspection Report 50-285/89-22)

Omaha Public Power District (OPPD) received the subject Notice of Violation. The report identified two violations. As stated in Reference 2 the second violation (285/8922-03) does not require a response. Attached please find OPPD's response to violation 285/8922-02 in accordance with 10 CFR Part 2.201.

If you have any questions concerning this matter, please contact us.

Sincerely,

K. J. Morris
Division Manager
Nuclear Operations

KJM/pjc

Attachment

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

IL-89-269

Attachment 1

RESPONSE TO NOTICE OF VIOLATION

During an NRC inspection conducted May 1-31, 1989, two violations of NRC requirements were identified. The violations involved the failure to institute a fire watch patrol and the failure to designate succession of authority. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation requiring a response is listed below:

A. Failure to Provide a Fire Watch Patrol

Technical Specification 2.19(7) states, in part, that all penetration fire barriers protecting safety-related areas shall be functional (intact). With a penetration barrier nonfunctional, 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, the licensee had not established a fire watch patrol on March 21, 1989, for all nonfunctional penetration fire barriers (fire doors). The doors had been installed with a 3/4-inch unprotected hole on one side of the door frame, thus making the doors potentially nonfunctional.

This is a Severity Level IV violation. (Supplement I) (285/8922-02)

OPPD RESPONSE (Violation A)

1. Reason for the Violation, if Admitted

OPPD admits the violation occurred as stated.

The reason for Violation A is incomplete acceptance criteria established in the installation procedure MP-FIREDOOR-2 Rev 3 "Replacement of Firedoors".

Twenty-three fire doors were procured with the 3/4 inch conduit connection holes, and the doors carried a UL label as a Class A (three hour) fire door. The doors were installed using an approved procedure designed to ensure the functional requirements of NFPA 80, "Standard for Fire Doors and Windows", were met during installation. The installation procedure required the establishment of a fire watch patrol per Technical Specification 2.19(7) prior to removal of the existing door, and required that the fire watch patrol remain in place until final Quality Control acceptance of the installed door per the acceptance criteria in the procedure.

The installation procedure in effect at the time of the fire door replacement project (MP-FIREDOOR-2 Rev 3) did not require permanent conduit connection to the electric strike as a condition of acceptance for operability.

If the acceptance of the installation procedure criteria had included the requirement for provision of permanent conduit connections to the electric strikes, the doors would not have been declared operable, and the fire watch patrol would not have been released.

It was felt that the 3/4 inch hole was insignificant with regard to fire resistance, and with the proper installation of functional hardware such as closers, locksets, hinges, and strikes, as well as the proper alignment of the door with regard to maximum perimeter gaps, the installation was sufficient to ensure the operability of the resulting fire door.

The fire door frame's primary purpose is to retain its structural integrity during a fire, and not to provide an insulating fire resistance. UL Standard 10B, "Fire Tests of Door Assemblies" allows for limited flame-through in door to frame perimeter gaps, and sets no limitation on backside temperatures during a furnace fire test. Conditions for acceptability of a door during a fire test require the integrity of the assembly be maintained such that final perimeter gaps, as well as flame through distance and duration, are within maximum limits.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A fire watch patrol was established, assuming the 3/4 inch holes on the door frames made the fire doors inoperable. A technical evaluation, PED-STE-89-72-J, using the provisions of Generic Letters 85-01, was performed to determine the adequacy of the fire resistance of the twenty-three doors in their existing configuration. The evaluation took into consideration the UL criteria for passing a three hour endurance test, the significance of the unprotected hole as it applies to the test criteria, and the combustible loadings involved in the areas affected. The evaluation concluded that the existing twenty-three fire doors provided a more than adequate margin of safety for protection from the hazards involved. Upon completion and approval of the evaluation, the fire watch patrols were discontinued.

CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Procedure Change Number 28845 to the current fire door installation procedure, GM-RR-FP-0502 Rev 0 "Firedoor Replacement" (supercedes MP-FIREDOOR-2) has been submitted to the PRC for approval. The change incorporates comprehensive acceptance criteria to be met following installation of a fire door prior to declaring the door operable as a fire resistive assembly. The general issue of door attachments will be reviewed and incorporated into this change along with an overall rewrite of the acceptance criteria. The requirement for provision of permanent conduit connections to electric strike assemblies has been included in this acceptance criteria. Procedure change to GM-RR-FP-0502 will be incorporated into the Operating Manual by July 26, 1989.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

OPPD is currently in full compliance with Technical Specification 2.19(7) regarding operability of Fort Calhoun Station firedoors.