

JUN 30 1989

In Reply Refer To:  
Docket: 50-285/89-09

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

Gentlemen:

Thank you for your letter of June 1, 1989, in response to our letter, Notice of Violation, and Notice of Deviation dated March 31, 1989. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation and Notice of Deviation. Your exception to Item 1 of the deviation was noted and we agree. 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:  
James L. Milhoan

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 (IE(1) w/enclosure of licensee ltr

RIV:DRP/B RPMullikin;df 6/27/89	C:DRP/B TFWesterman 6/27/89	D:DRP JLMilhoan 6/30/89
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bcc distrib. by RIV w/enclosure of licensee ltr:

R.D. Martin, RA

Section Chief (DRP/B)

RIV File

RSTS Operator

Lisa Shea, RM/ALF

A. Bournia, NRR Project Manager (MS: 13-D-18)

RPB-DRSS

MIS System

DRP

Project Engineer (DRP/B)

DRS

RRI

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

June 1, 1989  
LIC-89-408

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  
March 31, 1989

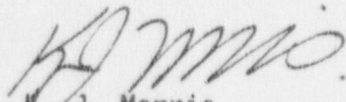
Gentlemen:

SUBJECT: Response to Notice of Violation/Deviation - Inspection Report  
50-285/89-09

Omaha Public Power District (OPPD) received the subject inspection report. The report identified one violation and one deviation. A one month extension was granted in order to obtain more information on the subject violation and deviation. Attached please find OPPD's response to these items 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/jak

Attachment

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

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7E01

Attachment 1

RESPONSE TO NOTICE OF VIOLATION

During an NRC inspection conducted on February 1-28, 1989, a violation of NRC requirements was identified. The violation involved modification of a plant system without the use of approved instructions. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation is listed below.

Modification of a Plant System Without the Use of Approved Instructions

Criterion V of Appendix B to 10 CFR Part 50 and the licensee's NRC-approved quality assurance program state, in part, that activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions.

Procedure SO-G-21, "Station Modification Control," states, in part, that modification of equipment shall be performed in accordance with written procedures.

Contrary to the above, the licensee modified equipment without written instructions in that two hangers on the fire water system were removed without written procedures and removal of the supports potentially affected the operability of Emergency Diesel Generator No. 1.

This is a Severity Level IV violation. (Supplement I) (285/8909-05)

OPPD RESPONSE

1. Reason for the Violation, if Admitted

OPPD admits the violation occurred as stated.

Starting in August, 1988, scaffolding was being erected in room 63, housing diesel generator (DG) 1, for work on Modification FC-88-60, DG 1/2, Exhaust Pipe Seismic Supports. The scaffolding was erected around and above a two inch fire water system pipe. The scaffolding was erected and removed under separate Maintenance Orders with no instructions in the Maintenance Orders to remove or replace the fire water piping hangers.

Sometime between scaffolding erection (August, 1988) and disassembly (December, 1988) two fire water hangers were removed. Routine inspections of the area by a shift supervisor in late December 1988, discovered the hangers to be removed. It is not known who removed these hangers and no documentation could be found to indicate why these hangers were removed. The reason for this violation, therefore, was personnel failure to adhere to the procedural requirement for identifying and reporting tasks which are beyond the scope of a maintenance order.

2. Corrective Steps That Have Been Taken and the Results Achieved

A deficiency tag (no. 881487) and a maintenance order (no. 890025) were written on January 1, 1989 to identify and correct the problem. Outstanding maintenance orders were jointly reviewed for safety concerns before startup by outage and maintenance management personnel. However, maintenance order 890025 was determined not to affect operability, therefore, was not scheduled for completion before startup. This error is considered an isolated instance since all other maintenance orders were assessed for safety concerns and acted on promptly. Subsequent to startup on January 31, 1989, the NRC senior resident inspector noticed these hangers missing on a plant tour February 13, 1989 and communicated this to OPPD. These hangers were reinstalled on February 15, 1989.

An investigation was conducted via discussions with the Supervisor of Maintenance, and with those personnel who had worked in the area (general maintenance, insulators, steamfitters, and ironworkers) to determine the reason for the hanger removal. However, no person claimed responsibility for the hanger removal or knowledge of why they were removed.

The Training Department has issued a "hotline" on the removal of pipe hangers, seismic supports, and snubbers to all maintenance craftsmen and planners, modification planners, and system engineers. This hotline emphasized awareness to operability concerns and strict procedural adherence for obtaining authorization to remove a seismic support, snubber, or hanger. This authorization and review must be obtained before work starts. This hotline requires a review by all the addressees and acknowledgment by signature. New maintenance personnel are taught strict procedural compliance requirements both in the General Employee Training (GET) course and the "Conduct of Maintenance" course.

With respect to the question of diesel generator operability posed by the hanger removal, Engineering Study 89-10 was initiated on February 15, 1989 to determine the system impact due to removal of the two subject hangers. The analysis indicated that this pipe would not rupture or fail during a seismic event with the two subject supports removed. Consequently, there was no safety concern posed to diesel generator operability.

3. Corrective Steps Which Will be Taken to Avoid Further Violations

OPPD believes the actions taken above are effective in addressing and correcting the root cause of this violation. However, continued emphasis on this training is planned by a commitment to develop a course for an introduction to work at the Fort Calhoun Station. This course will contain information in the hotline noted above. This course is to be completed before the 1990 refueling outage and will be given to both contractor and OPPD maintenance personnel before every refueling outage.

4. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance both with Criterion V of Appendix B to 10 CFR Part 50 and SO-G-21 as it pertains to this violation.

## RESPONSE TO NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted on February 1-28, 1989, a deviation of OPPD commitments made to the NRC was identified. The deviation consisted of the failure to install and test portions of the fire water sprinkler system. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the deviation is listed below.

### Failure to Install and Test Portions of the Fire Water Sprinkler System

- (1) Section 9.11.3 of the Updated Safety Analysis Report (USAR) states, in part, that a safe shutdown analysis has been performed on an area-by-area basis to satisfy the provision of Appendix R to 10 CFR part 50. Evaluation of fire protection for safe shutdown is contained in the Safety Evaluation Report (SER), "Fort Calhoun Power Station Unit 1," dated August 23, 1978.

Section 4.9 of the SER states, in part, that water curtains will be installed to reinforce protection by 3-hour fire doors at doorway openings between the turbine and the auxiliary building.

In deviation from the above, the licensee did not install a water curtain at the doorway opening between the fan room (in the turbine building) and Room 81 (in the auxiliary building).

- (2) Section 9.11.4 of the USAR states in part that testing is performed and verified by inspection and audit to demonstrate conformance with subsequent design and system readiness requirements.

In deviation from the above, the licensee failed to test the eight fusible-link valves that supply the water curtains.

### OPPD RESPONSE

#### 1. Reason for the Deviation, if Admitted

With respect to No. 1 above, OPPD respectfully requests the NRC to reconsider classifying this item as a deviation. Subsequent to the exit meeting with the senior resident inspector, more information became available which was not presented at the exit meeting. Water curtains are installed at all doorway openings between the turbine building and the auxiliary building. Water curtains are not required between the fan room (Room 82) and Room 81 because they are both in the auxiliary building. Due to the unavailability of information at the exit meeting, an apparent misunderstanding regarding the location of the fan room (called the turbine building mechanical equipment room) occurred due to this room being evaluated in conjunction with the turbine building in the FCS Updated Fire Hazards Analysis, Rev. 3, dated September 9, 1988, as Fire Zone 46.1. The Fire Protection Program Review dated December 31, 1976, upon which the SER is based, describes the fan room as Fire Area 44 located in the auxiliary building. Water curtains are currently installed to fire protect the opening from the fan room into the turbine building.

With respect to deviation No. 2, OPPD admits the deviation. However, no specific surveillance program is required or in place to test the fusible-link valves. These valves are considered part of the turbine building sprinkler system and are visually inspected weekly by Operating Instruction 01-FP-6 "Fire Protection System Inspection and Test" as part of the turbine building sprinkler system as described in the USAR. OPPD classifies the fusible link valves as special hazard wet pipe sprinkler heads and believes this classification is more in keeping with the intent of the NFPA codes and ANI recommendations.

2. The Corrective Steps Which Have Been Taken and the Results Achieved.

OPPD requests reconsideration of this deviation (see OPPD response No. 1).

With respect to deviation No. 2, OPPD has reviewed the evaluations of areas protected by the water curtain installations in the latest revision of the Fort Calhoun Fire Hazards Analysis (Rev. 3). The water curtain installations were incorporated into the SER on Technical Specification Amendment 40 (August 23, 1978) to reinforce protection by three hour fire doors at doorway openings between the turbine building and the auxiliary building. It has been determined that the water curtains are not required to protect safe shutdown components due to the adequacy of installed fire barriers between the turbine building and auxiliary building openings. Consequently, OPPD is pursuing an amendment to the Fire Protection SER to delete the requirement for these water curtains as additional protection since they are unnecessary to preserve safe shutdown capability in the event of a turbine building fire.

3. The Corrective Steps Which Will Be Taken To Avoid Further Deviations.

OPPD requests reconsideration of this deviation (see OPPD response No. 1).

With respect to deviation No. 2, OPPD has implemented a Fire Protection Design Basis Review Program which has the goal of adopting the standard license condition for fire protection as described in NRC Generic Letter 86-10. This will incorporate the fire protection program and major commitments, by reference, into the USAR. Inherent in this review is a reassessment of fire protection commitments for clarity and compliance. This effort should help to avoid future deviations of fire protection commitments. For the reasons noted above, no interim compensatory measures are needed since the safe shutdown function is preserved without the fire water curtains.

4. Date When Full Compliance Will Be Achieved

OPPD requests reconsideration of this deviation (see OPPD response No. 1).

With respect to deviation No. 2, OPPD will be in full compliance upon approval of the SER amendment noted. Submittal of this amendment is scheduled by June 30, 1989.