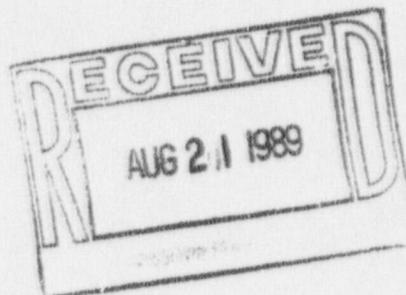


William C. Jones  
Senior Vice President

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

August 17, 1989  
LIC-89-680



Mr. Robert D. Martin  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

References: (1) Docket No. 50-285  
(2) Letter NRC (R. D. Martin) to OPPD (K. J. Morris) (NRC  
Inspection Report 89-22), dated June 29, 1989  
(3) NRC-OPPD Public Meeting, July 13, 1989

Dear Mr. Martin:

SUBJECT: NRC-OPPD Public SALP Meeting

The Omaha Public Power District (OPPD) received the report of the Systematic Assessment of Licensee Performance (SALP) for the period May 1, 1988 through April 30, 1989. It is noted that the ratings received were based on management's efforts to address significant weaknesses, including progress made toward completion of items in the Safety Enhancement Program. OPPD appreciated the opportunity to have met with you and other members of the NRC staff at the 1989 public SALP meeting. Again, OPPD wants to emphasize its commitment to the continued safe operation of the Fort Calhoun Station.

OPPD takes note of the licensee recommendations identified in Reference 2. These specifics are addressed in the attachment to this letter in the appropriate functional area. Each section of the attachment contains the recommendations identified in Reference 2 and a brief summary of OPPD's activities to address those recommendations which were discussed with you and your staff at the public meeting. OPPD remains committed to keeping you and your staff apprised of the progress and effectiveness of the activities currently underway.

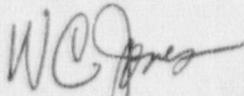
It is anticipated that the activities identified in Attachment 1 to address the recommendations, will further enhance the activities associated with the Fort Calhoun Station. The progress made in these and other areas will be evident in future assessments.

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Mr. R. D. Martin  
LIC-89-680  
Page 2

Again, thank you for the valuable feedback provided at the meeting. If you should have additional comments, please contact me.

Sincerely,



W. C. Jones  
Senior Vice President

WCJ/pjc

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae  
A. Bournia, NRC Project Manager  
P. H. Harrell, NRC Senior Resident Inspector  
Document Control Desk

A. OPERATIONS:

RECOMMENDED LICENSEE ACTIONS

Licensee management should devote additional attention to the apparent problem of personnel not following procedural requirements. Although this area is currently being addressed by an item contained in the SEP, it does not appear that the actions are being implemented in a timely manner.

In addition to SEP items, additional management attention should be provided for the hiring and training of personnel to become licensed operators.

OPPD Response

OPPD management is continuing to emphasize procedural compliance at meetings with shift supervisors and operators, and is promoting a culture of procedural compliance. An Operations Standing Order on "Conduct of Operations" has been revised to clarify procedure compliance requirements. This provides an added level of management emphasis on the requirements for following procedures in the operations area.

The procedures upgrade program will improve the overall level of detail and will assist our efforts to ensure procedural compliance. Operations manpower has been committed to verify and validate the upgraded operations procedures. Operations involvement in this process will greatly enhance procedure compliance once the upgraded procedures are issued. Until the procedures upgrade is completed, operations personnel have been directed to make changes to procedures as necessary to ensure procedural compliance.

OPPD has expanded the staffing in the Operations department from 50 to 60 operators with an additional four (4) vacancies expected to be filled by December 1989. This will provide a larger pool from which licensed personnel can be developed. A plan to increase the number of licensed operators has been recently implemented. This plan will result in three (3) additional licensed operators to staff operating shift positions in May 1990; six (6) additional in November 1990; and six (6) to nine (9) additional in October 1991 assuming all candidates pass the NRC exam.

B. RADIATION PROTECTION:

RECOMMENDED LICENSEE ACTIONS

The licensee should continue the on-going efforts toward improvement in the radiological controls area by completion of the implementation of the radiological protection enhancement program actions identified in the SEP, and by continuing to stress improvement in procedural compliance and self-identification of problems.

OPPD Response

Implementation of a Radiation Protection Enhancement Program was ongoing throughout the assessment period. It is expected that with the upcoming approval of radiation protection procedures and continued emphasis by plant management that procedural compliance as well as other areas addressed in the Radiation Protection Enhancement Program, will continue to improve.

An extensive reorganization of the radiological and chemistry areas was implemented. OPPD has hired experienced RP managers and supervisors and will fill the remaining vacancies with well qualified personnel. Staffing has also been increased. OPPD is committed to self-identification of problems and is continuing to strive for excellence in the RP area. Routine quality assurance and audit functions have been supplemented with consultant personnel.

Overall, completion and institutionalization of the SEP items in Radiation Protection will continue OPPD's improvements in this area.

#### C. MAINTENANCE/SURVEILLANCE:

##### RECOMMENDED LICENSEE ACTIONS

In addition to the SEP, licensee management should focus their attention on ensuring that personnel performing safety-related activities complete the tasks in accordance with the procedures, as written, or change procedures when required.

##### OPPD Response

As noted in the Operations area, OPPD remains committed to procedural compliance. The procedure upgrade is underway. Manpower is being dedicated to the verification and validation process of the new or upgraded procedures. Completion of this process will go a long way toward improving procedural compliance. As noted in the Operations area, OPPD remains committed to procedural compliance. Additional emphasis on procedural compliance is maintained through the use of the incident report process. Management has stressed that they will hold personnel accountable whenever procedures are inappropriately used.

OPPD has implemented the daily Plan-of-the-Day which improves communication on maintenance and surveillance activities. OPPD intends to concentrate on improved planning and scheduling of maintenance work in the next year along with the SEP items. We believe this area will further enhance both the quality of maintenance and the efficiency with which it is performed.

Based on a finding during a routine inspection of startup testing activities, OPPD has implemented an independent review of core physics start up data as part of the Start-Up Testing Procedure. This added step combined with the experience level of OPPD personnel will preclude any future errors in this area.

#### D. EMERGENCY PREPAREDNESS

##### RECOMMENDED LICENSEE ACTIONS

Licensee management should continue to provide strong support for the emergency preparedness program. The licensee should closely monitor remedial actions for weaknesses identified during the 1988 exercise to prevent recurrence.

##### OPPD Response

OPPD has taken many positive steps toward the overall improvement of the emergency planning area. OPPD has added experienced personnel in all Nuclear Divisions, which provides a more experienced personnel base from which to draw members of the Emergency Response Organization.

Programs and projects are underway which have the objectives of:

- Rewrite and improvement of Emergency Plan Implementing Procedures
- Increasing frequency of table top and specific mini-drills to improve performance of Emergency Response Organization personnel
- Improve training of Emergency Response Organization personnel
- Assigning personnel to emergency duties better correlated to their normal daily duties to draw upon experience level from increases in nuclear staff.

OPPD has provided strong support for the EP program in the last year, continuing emphasis on eliminating deficiencies identified during emergency exercises.

## E. SECURITY

### RECOMMENDED LICENSEE ACTIONS

Licensee management should continue to provide strong support to the implementation of the corrective actions identified in the security upgrade program. Close monitoring of the completion of the upgrade security hardware program currently in process may be required to ensure timely completion. Additional attention should be provided by management to continue to ensure effective day-to-day operation of the security force.

### OPPD Response

Staffing levels and management involvement in day-to-day security activities were noted as concerns in the recent assessment. With the placement of a Security Systems Specialist on July 17th, the Security Services Department will have filled all of the previously identified "key positions" in the organization. The Operations Section is now staffed with a Senior and six Shift Security Supervisors in addition to an Operations Supervisor with over ten years of security force operating experience. The Department Manager position is filled by an individual with over thirteen years of nuclear security management experience.

With the increased levels of experience, the Security Services Department is now able to become thoroughly involved in daily security coordination meetings between security force and security training representatives, participate actively in the Station's Plan of the Day meeting, continue to review the daily incident reports generated on shift, and emphasize a continuation of supervisory oversight through tours of the work area and fixed security posts.

Because the Security Computer Upgrade has been delayed beyond previously projected completion dates, considerable management attention has been directed toward this activity. The Security Department has established a single point of contact to interface between construction, engineering, and security operational personnel. This position is accountable to ensure that difficulties experienced in the start-up of the new system are minimized. Security representatives are participating in a weekly construction coordination meeting and also a bimonthly Division Manager oversight meeting to ensure project completion. The project is currently scheduled to be completed by the end of September, 1989; this schedule is being very closely monitored.

As noted above, the Security Services Department has made considerable progress in both redesigning and staffing a more functional security organization. "Key positions" have been filled with experienced personnel who have made both personal and professional commitments to establish Fort Calhoun Station as the best nuclear security program and organization in Region IV. To promote organizational development, each member of the security management team will participate in career planning which is targeted toward providing employee growth and progression. The Manager - Security Services position has been identified as a "key position" in the Nuclear Operations Division and because of this, the incumbent and subordinates are participating in succession planning strategies. This concerted and proactive effort will ensure the long-term stability of the entire Security Services Department management team.

#### F. ENGINEERING/TECHNICAL SUPPORT

##### RECOMMENDED LICENSEE ACTIONS

In addition to the SEP, the licensee should focus additional management attention in the area of the licensed operator requalification program to implement the necessary actions to maintain a satisfactory program and to improve the oversight of the program to ensure that the licensee identifies programmatic problems rather than relying on the NRC to identify the problems.

##### OPPD Response

During the assessment period, OPPD continued activities begun to strengthen the Technical Support for operations, maintenance, surveillance, configuration management, and design change control. Numerous Special Projects (e.g. Design Basis Reconstitution, PRA, System Engineering Group, Procedure Upgrade Project, and Project 1991) will continue to receive management support and monitoring to pursue resolution during the upcoming assessment periods.

Emphasis is being placed on institutionalizing various commitments through programs, policy statements, procedures, organizational structure, training, engineering instructions, coaching and counseling and holding individuals accountable. Timely completion of various commitments will be ensured through improved short term and long term planning. As programs are completed (e.g., welding, procurement engineering), ongoing implementation is being ensured through assignment of dedicated personnel and transition planning.

In order to implement actions to maintain a satisfactory licensed operator requalification program, several actions have been taken. OPPD initiated action in the fall of 1988 to identify and employ an individual with experience in licensed operator training management to assist the Manager - Training with the oversight of licensed operator requalification training. An individual, who previously managed operator and simulator training at another utility, reported to OPPD in April, 1989 to fill this position. One of this individual's specific assignments is to provide oversight of licensed operator requalification training to assure a satisfactory program is maintained and to ensure that programmatic problems are identified and corrected. In addition, this individual has responsibility for the development and implementation of the simulator training program including development of static simulator questions and simulator crew evaluations.

A procedure is under development which will strengthen the oversight of the administration of annual requalification examination by requiring management review and approval of the grading of examinations with barely passing or failing grades. A follow-up to the independent assessment of operator training will be conducted to evaluate the implementation of corrective actions taken in response to the initial assessment. OPPD believes this will address the NRC's concern in the area of licensed operator requalification activities.

#### G. SAFETY ASSESSMENT, QUALITY VERIFICATION

##### RECOMMENDED LICENSEE ACTIONS

The licensee should provide additional management attention to the completeness and technical content of submissions made to NRR in response to NRC-identified initiatives and TS amendment requests initiated by the licensee. Additional management attention is required to ensure that appropriate corrective actions are taken as a result of plant events. Licensee management should provide timely training and staffing of the NSRG to provide an independent review group to address the root causes of plant problems.

##### OPPD Response

OPPD has upgraded the capabilities to perform safety assessments and quality verifications by expanding and strengthening the membership of our onsite and offsite safety committees; by increasing the staff of the QA/QC organization, and by the establishment of the Nuclear Safety Review Group. OPPD's actions to further improve in the area of timely staffing and training of our NSRG include the following. The NSRG staff currently consists of a Manager, four (4) SRG Specialists, and a clerk. In addition to these OPPD personnel, OPPD has, since last fall, maintained three (3) non-OPPD consultants on the SRG staff. A total of seven (7) OPPD SRG Specialists are desired. For the three (3) remaining OPPD positions, one offer of employment has already been accepted. Every effort will be made to ensure the last two positions in this assessment group are filled as soon as possible.

OPPD's QA group and their focus has been shifted from a compliance orientation to an operational-safety orientation by full implementation of our performance-based audit and surveillance program. The QA surveillance program was upgraded at the end of last year and the QA audit program was upgraded last March. These program enhancements will strengthen OPPD's assessment capability. Furthermore, the offsite safety committee will conduct an independent review this September of the effectiveness of both OPPD's QA and Nuclear Safety Review groups. These actions taken and planned should improve the safety assessment and quality verification activities.

The Licensing group has established written criteria for proper content of Licensing submittals which have been supplied to affected managers. The focus of these standards is to improve the quality of correspondence sent to the NRC. Additionally, technical groups are being provided feedback in light of the Licensing standards and management expectations. Emphasis is placed on holding the technical groups accountable for their products. The increases in experienced staffing throughout the nuclear organizations will also provide for an improvement in the quality of technical submittals.

Although LER's were noted as adequate, the assessment noted a recurrence of the same types of events, implying inadequate corrective action is being taken. In some regards, the large number of LER's in this functional area is due to the number of corrective action and improvement programs underway, such as the design basis reconstitution. Operational events which appear to be recurring will benefit from the following actions. The position of LER coordinator has been staffed, providing experienced oversight to the LER process. This position provides a focal point for the LER process, assists with reportability determinations, and coordinates reviews. Training in root cause and LER writing is scheduled for later this year.