

APPENDIX

NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
License: DPR-40

During an NRC inspection conducted from October 31 through November 10, 1989, violations of NRC requirements were identified. The violations involved procedural control of shift turnover logs, failure to follow procedures, inadequate control of temporary procedure changes, inadequate instructions for the performance of safety-related activities, failure to comply with ASME Code requirements, and inadequate corrective action program. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below.

A. No Procedural Control for Shift Turnover Logs

Technical Specification 5.8.1 states, in part, that written procedures shall be established that meet or exceed the minimum requirements of Appendix A of Regulatory Guide 1.33.

Paragraph 1 of Appendix A to Regulatory Guide 1.33 requires that administrative procedures shall be established for shift and relief turnover.

Contrary to the above, the licensee failed to establish an adequate procedure for shift turnover in that Standing Order O-29 did not specify that Forms FC-95 and FC-95A, used by operations personnel to record plant status, had to be completed for shift turnover. (285/88201-01)

This is a Severity Level IV violation. (Supplement I)

B. Failure to Follow Procedures

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

The items discussed below provide examples of the licensee's failure to follow instructions provided in procedures.

1. Paragraph 3.1.4.6 of Standing Order O-24, "Log Entries" states, in part, that log entries should be made when documenting compliance with the requirements of a Technical Specification limiting condition for operation.

Contrary to the above, the licensee did not provide the appropriate log entries in that compliance with the limiting condition for operation for Technical Specification 2.19(4) for the motor-driven fire pump was not met and the appropriate log entry was not made. (285/88201-02)

2. Paragraph 2.3 of Standing Order 0-13, "Operations Memorandums," states, in part, that as soon as practical following the issuance of an operations memorandum, a review shall be conducted to ensure that all information is installed into all applicable operating procedures or instructions.

Contrary to the above, operations memoranda were issued and the information not included into all applicable operating procedures or instructions in that operations memoranda affecting procedures had been issued for up to 10 years and the applicable procedure had not been changed. (285/88201-03)

3. Paragraph 7.2.2 of Standing Order 0-25, "Temporary Modifications," states, in part, that the plant review committee must review and approve the temporary modification within 14 days after the date of its installation.

Contrary to the above, the plant review committee did not review temporary modifications within 14 days after installation in that Temporary Modifications 88-E-46, 88-E-49, and 88-E-47 had been installed greater than 14 days without being reviewed by the plant review committee. (285/88201-05)

4. Paragraph 1.2 of Standing Order 0-17 states, in part, that the approved operating instructions will be used to startup, operate, and shutdown all plant systems and equipment.

Contrary to the above, licensee personnel failed to use procedures for operation of plant systems in that the component cooling water and resin transfer systems were operated without the use of procedures. (285/88201-09)

5. Paragraph 5.9.9 of Standing Order G-17, "Maintenance Order," states, in part, that the craftsman is responsible for recording the purchase order number for parts and materials used that are CQE (safety-related), limited CQE, fire protection, or radioactive waste packaging materials.

Contrary to the above, the craftsman failed to provide the appropriate data on the maintenance order in that the purchase order number was not recorded on Maintenance Order 884163 for parts used to repair the breaker for Charging Pump CH-1C. (285/88201-10)

6. Procedure ST-ISI-RW-3, "Raw Water Pump Inservice Inspection," states, in part, that the craftsman shall measure and record the pump peak-to-peak vibration amplitudes on the stuffing box just below the bearing packing nut, perpendicular to the pump shaft. The exact location should be marked by a yellow "X". If no mark is present, check vibration amplitude completely around the circumference and use the maximum amplitude found. Mark the location for the greatest amplitude for future reference.

Contrary to the above, licensee personnel failed to follow procedure in that no mark was present on the stuffing box and the craftsman failed to check the vibration amplitude completely around the circumference of the stuffing box. (285/88201-22)

This is a Severity Level IV violation. (Supplement I)

C. Inadequate Control of Temporary Procedure Changes

Technical Specification 5.8 states, in part, that temporary changes to procedures may be made provided that the intent of the original procedure is not altered and the change is documented, reviewed by the plant review committee and approved by the Manager, Fort Calhoun Station within 14 days of implementation.

1. Contrary to the above, the intent of a procedure was changed without prior approval of the plant review committee in that the acceptance criteria provided in Surveillance Test ST-DC-1, "Station Batteries," was deleted during performance of the surveillance test. (285/88201-15)
2. Contrary to the above, the plant review committee did not review and the Manager, Fort Calhoun Station, did not approve temporary procedure changes within 14 days in that temporary changes were made to Surveillance Test ST-CONT-2, "Local Leak Rate Testing-Type B," and the temporary changes were not approved within the 14-day time limit. (285/88201-19)

This is a Severity Level IV violation. (Supplement I)

D. Inadequate Instructions for Performance of Safety-Related Activities

Criterion V of Appendix B to 10 CFR Part 50 and the licensee's NRC-approved quality assurance program states, in part, that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances.

1. Contrary to the above, Procedure PM-EE-4.0, "7700 Line Motor Control Centers," that provided instructions for postmaintenance testing of 480-volt breakers did not provide instructions for postmaintenance testing of all 480-volt breakers. For example, no instructions were included in the procedure for postmaintenance testing of the breaker for the pressurizer relief isolation valve (HCV-150). (285/88201-13)

2. Contrary to the above, Procedure ST-ISI-RW-1, "Raw Water Valves Inservice Testing," did not provide instructions for testing of Bettis valve operators; however, the procedure was issued for testing the valve stroke time for a valve with a Bettis operator. (285/88201-21)

This is a Severity Level IV violation. (Supplement I)

E. Failure to Comply With ASME Code Requirements

Section 50.55a(g)(4) of 10 CFR Part 50 requires that the appropriate provisions of Section XI of the ASME Code be applied during conduct of inservice tests of the operability of pumps and valves. Article IWV-3413 of Section XI states that full-stroke time is that time interval from initiation of the actuating signal to the end of the actuating cycle.

Contrary to the above, the licensee performed inadequate inservice testing of Valve HCV-1749 in that the full-stroke time was determined from the time of actuation of the local solenoid until the end of the actuating cycle in lieu of the determination of the full-stroke time from initiation of the actuating signal (i.e., when the control switch for the valve is operated).

This is a Severity Level IV violation. (Supplement I) (285/88201-16)

F. Inadequate Corrective Action Program

Criterion XVI of Appendix B to 10 CFR Part 50 and the licensee's NRC-approved quality assurance program states, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

1. Contrary to the above, a condition potentially adverse to quality was not resolved in that the stroke time for Valve HCV-1749 varied from 3.8 seconds for the remote indication to 12.2 seconds for the local indication and the discrepancy was not identified to the appropriate licensee personnel. As a result, no corrective was initiated to promptly resolve the identified discrepancy. (285/88201-17)
2. Contrary to the above, the licensee has not established adequate measures to assure conditions adverse to quality are promptly identified in that the corrective action program does not contain all the elements necessary to address operational safety as listed below.
 - . Corrective actions specified in response to audit findings.
 - . Corrective action responses to material deficient conditions.

- . Licensee review of NRC Information Notices does not consider the generic aspects of potential problems identified in the notices.
- . Corrective action to be taken in response to preventive maintenance specified by the equipment vendor.
- . The corrective action to be taken when postmaintenance testing had not been performed on safety-related equipment.
- . Corrective action to ensure installed deficiencies would not affect equipment operability.
- . The licensee's threshold for identification of deficiencies as significant is inadequately defined.

The examples listed above identify areas where operational safety is not considered in the corrective action program. (285/88201-24)

This is a Severity Level IV violation. (Supplement I)

A response to Violation B.2 (unresolved Item 285/88201-03) is not required since an NRC inspection was performed to verify that you have taken satisfactory action to resolve the concerns identified in the violation. The details of the review performed by the NRC inspectors is provided in NRC Inspection Report 50-285/89-03.

Pursuant to the provisions of 10 CFR Part 2.201, the Omaha Public Power District is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this *7th* day of *March* 1989