



## Omaha Public Power District

1623 HARNEY ■ OMAHA, NEBRASKA 68102 ■ TELEPHONE 536-4000 AREA CODE 402

June 26, 1981

FC-411-81

Mr. K. V. Seyfrit, Director  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Reference: Docket No. 50-285/81-09

Dear Mr. Seyfrit:

This provides Omaha Public Power District's response to the Notice of Violation, Appendix A to IE Inspection Report 81-09, dated May 27, 1981.

### Violation

- A. Based on the results of an NRC inspection conducted during the period of April 1-30, 1981, and in accordance with the Interim Enforcement Policy, 45 FC 66754 (October 7, 1980), the following violation was identified:

Technical Specification 5.8.1 requires that "Written procedures . . . be established, implemented and maintained that meet or exceed the minimum requirements of Sections 5.1 and 5.3 of ANSI N18.7-1972 and Appendix A of US NRC Regulatory Guide 1.33. . ."

Standing Order G-7 establishes the Operating Manual and states in Section 1.3 that "adherence to (the) Operating Manual is mandatory."

Contrary to the above, the licensee failed to restore valves SI-223 and SI-224 to their proper position as required in step F.1.b(2) of surveillance test procedure SI/CS Pumps and Valves performed on March 17, 1981.

### Response

1. Corrective steps which have been taken and the results achieved.

The surveillance test has been revised to ensure that the pressure gauge isolation valves have been repositioned to their desired position after testing. The open instrument isolation valves did not represent a degradation of a safety system. In order to ensure the accuracy of the subject pressure gauges for ISI testing, these valves are normally closed so that the gauges are not continually exposed to system pressures. It should be noted that the normal alignment of the valves in question is a desired position not a required position.

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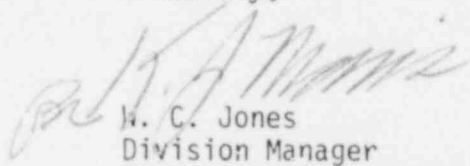
2. Corrective steps which will be taken to avoid further violations.

Surveillance test procedures will be reviewed in accordance with the normal operating manual biennial review schedule to assure that sufficient detail exists in return to normal valve line-ups.

3. Date when full compliance will be achieved.

The Omaha Public Power District is presently in full compliance.

Sincerely,



W. C. Jones  
Division Manager  
Production Operations

WCJ/RLA/SCS/WGG:jmm

cc: LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of

Omaha Public Power District  
(Fort Calhoun Station,  
Unit No. 1)

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}  
Docket No. 50-285

AFFIDAVIT

. . . . . being duly sworn, hereby deposes and says that he is Manager - Administrative Services of Omaha Public Power District; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to the Notice of Violation, identified in NRC Inspection Report 81-09; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

*K. J. Morris*

K. J. Morris  
Manager - Administrative Services

STATE OF NEBRASKA)  
                          ) ss  
COUNTY OF DOUGLAS)

Subscribed and sworn to before me, a Notary Public in and for the State of Nebraska on this 26TH day of June, 1981.

*J. T. Gleason*  
\_\_\_\_\_  
Notary Public

