



Omaha Public Power District

1723 HARNEY J OMAHA, NEBRASKA 68102 * TELEPHONE 536-4000 AREA CODE 402

July 30, 1981

Mr. Robert A. Clark, Chief
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Operating Reactors Branch No. 3
Washington, D.C. 20555



Reference: Docket No. 50-285

Dear Mr. Clark:

The following is the District's response to the Commission's letter dated May 4, 1981, concerning qualification of inspection, examination, and testing and audit personnel.

The District has reviewed the Commission's position on Regulatory Guide 1.146 and C.5, 6, 7, 8, and 10 of Regulatory Guide 1.58, Rev. 1 and commits to the following:

Regulatory Guide 1.146 - The District presently conforms to the requirements of ANSI/ASME N45.2.23-1978 with Quality Assurance Procedure (QAP) #18. Thus, the District is presently in full compliance with Regulatory Guide 1.146.

Regulatory Guide 1.58, Position C.5 - The District presently has very strict capability requirements for an ANSI Level III position, although presently there are no ANSI Level III personnel. The District is reviewing its Level III capability requirements to insure they conform to Position C.5. Full compliance is expected by January 1, 1982.

Regulatory Guide 1.58, Position C.6 - In general, District personnel in positions involving nuclear power plant inspections, examinations, and testing are required to have high school diplomas or the equivalent as a condition for employment. To insure full compliance, the District will add to its procedures the requirements to meet ANSI N45.2.6-1978 and Position C.6 of Regulatory Guide 1.58, Rev. 1. The District will be in full compliance by January 1, 1982.

Regulatory Guide 1.58, Position C.7 - The District is presently reviewing its training requirements for personnel not meeting the requirements of ANSI N45.2.6-1978 to insure that only those personnel with an acceptable level of competence are used in the activities specified in ANSI N45.2.6-1978, Section 4. Additionally, personnel not meeting the requirements of ANSI N45.2.6-1978 will continue to be supervised by a qualified individual participating in the inspection, examination, or test. The District will be in full compliance by January 1, 1982.

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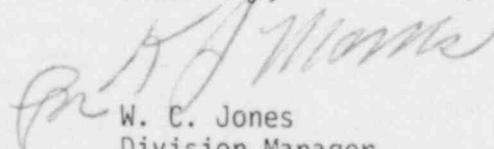
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Regulatory Guide 1.58, Position C.8 - It has always been District policy to enforce and implement procedures which maintain occupational radiation exposures as low as is reasonably achievable. Instructions in radiation protection and radiation-dose-reduction considerations are provided on a periodic basis through Radiation Protection Training courses. The District is presently in full compliance.

Regulatory Guide 1.58, Position C.10 - By maintaining thorough qualification records of education, experience, and training and by frequently evaluating performance, the District has available documented objective evidence which can demonstrate "equivalent" competence. Regulatory Guide Position C.10 will be added to District procedures to insure full compliance by January 1, 1982.

The District is presently in full compliance with ANSI N45.2.6-1978 and intends to be in full compliance with Positions C.5, C.6, C.7, and C.10 by January 1, 1982.

Sincerely,

A handwritten signature in cursive script, appearing to read 'W. C. Jones', is written over the typed name.

W. C. Jones
Division Manager
Production Operations

WCJ/KJM/TLP/RWS:jmm

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