

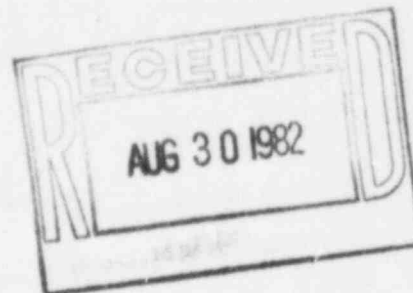


## Omaha Public Power District

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

August 27, 1982  
LIC-82-307

Mr. W. C. Seidle, Chief  
Reactor Project Branch 2  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011



Reference: Docket No. 50-285  
IE Inspection Report 82-12

Dear Mr. Seidle:

### Response to Notice of Violation

The referenced Inspection Report identified one violation regarding the failure of one individual to wear the appropriate clothing as specified by the Radiation Work Permit. Omaha Public Power District's response to this violation is attached.

Sincerely,

W. C. Jones  
Division Manager  
Production Operations

WCJ/TLP:jmm

Attachment

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

Mr. Lawrence A. Yandell, NRC  
Senior Resident Inspector

OMAHA PUBLIC POWER DISTRICT'S RESPONSE  
TO IE INSPECTION REPORT 82-12

Violation

Failure to Follow Procedures

Technical Specification 5.8.1 requires that "written procedures . . . be established, implemented and maintained that meet or exceed the minimum requirements of Section 5.1 and 5.3 of ANSI N18.7-1972, and Appendix A of USNRC 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."

Section 2.10.1 of the Fort Calhoun Station Radiation Protection Manual, (volume VII of the Operating Manual) states that "all . . . instructions of Radiation Work Permits (RWP's) will be obeyed."

Contrary to the above, on June 17, 1982, a licensee representative failed to wear the appropriate clothing required by the RWP under which he entered the control area. As a result, the person and parts of his clothing became contaminated in excess of allowable limits for the unrestricted area.

Response

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

The following corrective measures have been taken as a result of this noncompliance:

- a. The individual who did not comply with the Radiation Work Permit clothing requirements was immediately restricted from access to the radiation controlled areas at the Fort Calhoun Station and appropriately disciplined. This restriction was enforced until the individual was reinstructed on the importance of following RWP requirements and successfully completed a General Employee Retraining program in radiation protection.
- b. The General Employee Training (GET) and Retraining program lecture for radiation protection has been upgraded to further stress the necessity of compliance with Radiation Protection Manual and RWP requirements. The GET radiation protection lecture outline is presently being revised to permanently incorporate this additional emphasis on procedural compliance.
- c. A new program has been implemented to require that individuals participating in badge training or retraining, which results in the unrestricted access to radiation controlled areas, successfully complete a written examination on radiation protection principles. The written examination ensures that the individual has an in-depth knowledge of radiation protection

requirements prior to being granted unrestricted access. This written examination is now required in addition to demonstration of practical performance factors.

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

The Radiation Protection Manual (RPM) will be revised to include provisions for a formal program for documenting, tracking, and correcting noncompliances with the RPM. This program will provide management with a tool for identifying individuals that do not adhere to RPM procedures so that appropriate restrictive or disciplinary action(s) can be taken. This is expected to be completed and implemented by September 30, 1982.

3. Date when full compliance will be achieved.

The Omaha Public Power District is presently in full compliance.