

Omaha Public Power District
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402/536-4000

May 29, 1990
LIC-90-0409

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

REFERENCES: 1. Docket No. 50-285
2. Letter from NRC (S. J. Collins) to OPPD (W. G. Gates) dated April 27, 1990

Gentlemen:

SUBJECT: Response to Notice of Violation - Inspection Report 50-285/90-14

Omaha Public Power District (OPPD) received the subject inspection report which identified one violation. The violation involved the failure to establish adequate abnormal operating procedures (AOPs). Please find attached OPPD's response to the Notice of Violation in accordance with 10 CFR Part 2.201.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/sl

Attachment

c: LeBoeuf, Lamb, Leiby & MacRae
A. Bournia, NRC Project Manager
R. D. Martin, NRC Regional Administrator, Region IV
P. H. Harrell, NRC Senior Resident Inspector

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ATTACHMENT

RESPONSE TO A NOTICE OF VIOLATION

During an NRC inspection conducted on March 12-16, 1990, a violation of NRC requirements was identified. The violation involved the failure to establish adequate abnormal operating procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violation is listed below:

Inadequate Abnormal Operating Procedures

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

Regulatory Guide 1.33, Appendix A, Section 6, requires procedures for combating emergencies and other significant events. This includes the following:

- Expected transients
- Loss of electrical power (and/or degraded power sources)

Fort Calhoun Station Updated Safety Analysis Report, Section 12.3.2, states, "Plant operation during abnormal conditions are conducted in accordance with written ... procedures. These emergency procedures have been written such that the operator can readily perform the immediate action necessary based on a given set of conditions..."

Contrary to the above, the following are examples of procedures that were not adequately established.

1. Abnormal Operating Procedure AOP-16, "Loss of Instrument Bus Power," Revision 0 (January 4, 1990), did not address the loss of vital equipment powered from the four 120V AC inverter buses, such as radiation monitoring panels and steam generating level controls. The procedure did not provide guidance for operations during the potential off-normal conditions associated with the loss, or degradation of a 120V AC inverter bus.
2. Written procedures had not been established addressing the loss or degradation of the following vital electrical power sources:
 - 4160V AC Vital bus 1A3 or 1A4
 - 480V AC Vital Buses 1B3A, 1B3B, 1B3C, 1B4A, 1B4B, 1B4C, 3A-4A, 3B-4B, 3C-4C
 - 125V DC Vital Bus DC-1 (EE-8F), AI-41A; or DC-2 (EE-8G), AI-41B

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

OPPD Response:

1. The Reason For The Violation, If Admitted

OPPD admits to the violation as stated. Prior to Inspection 90-14, it was OPPD's opinion that the existing combination of EOPs, AOPs and Alarm Response Procedure (OP-10) were adequate to respond to a loss of an individual electrical bus. OPPD had initiated action to respond to Inspection Follow-up Item (285/8936-03) concentrating on upgrading Alarm Response Procedures (ARPs) to enhance OPPD's ability to respond to loss of electrical buses. However, no upgrade work associated with a loss of an electrical bus had been undertaken at the time of Inspection 90-14 on the ARPs. The AOPs were being upgraded as part of SEP-49, but the AOP upgrade was limited to reformatting and assuring technical accuracy of the existing AOPs. This upgrade did not expand the scope of the AOPs which would have been necessary to respond to this concern.

2. The Corrective Steps Which Have Been Taken And The Results Achieved

OPPD has initiated an upgrade to AOP-16 "Loss of Instrument Bus Power" to address the concerns identified in Inspector Follow-up Item (285/8936-03) to provide guidance on operator response to loss of vital equipment or other equipment which would cause the plant to undergo a significant transient.

3. Corrective Actions That Will Be Taken To Avoid Further Violations

To avoid further violations involving the availability of written procedures for combatting emergencies and other significant events, OPPD is taking the following actions:

- a. As discussed in Item 2, OPPD is currently in the process of upgrading AOP-16, "Loss of Instrument Bus Power". This upgrade will encompass losses of any of the following instrument buses:

- 1) The four vital 120V AC instrument buses (instrument buses A, B, C, and D)
- 2) The two non-vital 120V AC instrument buses (instrument buses 1 and 2)
- 3) The two vital 125V DC instrument buses (DC buses DC-1 and DC-2)

OPPD expects the upgrade of AOP-16 to be completed by October 1, 1990.

- b. OPPD plans to develop a new Abnormal Operating Procedure to direct operator actions under the following circumstances:

- 1) A Loss of Offsite Power or Station Blackout while the unit is shut down.
- 2) Loss of any single vital 4160V AC power bus, vital 480V AC power bus, or vital 480V AC Motor Control Center.

OPPD expects the development of this new procedure to be completed by March 1, 1991.

4. Date When Full Compliance Will Be Achieved

With the implementation of the changes to AOP-16, and with the development of the new AOP on loss of AC power buses, OPPD expects to be in full compliance with the requirements of Technical Specification 5.8.1 as they relate to abnormal operating procedures, by March 1, 1991.