

Omaha Public Power District

P.O. Box 399 Hwy. 75 - North of Ft. Calhoun Fort Calhoun, NE 68023-0399
402/636-2000

May 4, 1993
LIC-93-0058

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

References: 1. Docket No. 50-285
2. Letter from NRC (A. B. Beach) to OPPD
(T. L. Patterson) dated April 5, 1993

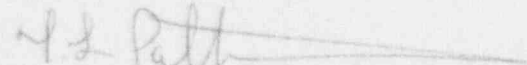
Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/93-03 Reply to a
Notice of Violation (NOV)

The subject report transmitted a NOV resulting from an NRC inspection conducted January 31 through March 13, 1993 at the Fort Calhoun Station. Attached is the Omaha Public Power District (OPPD) response to this NOV.

If you should have any questions, please contact me.

Sincerely,



for W. G. Gates
Vice President

Attachment

WGG/cfs

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Project Manager

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REPLY TO A NOTICE OF VIOLATION

VIOLATION

During an NRC inspection conducted on January 31 through March 13, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 2.15(1) states, "In the event the number of channels of a particular system in service falls one below the total number of installed channels, the inoperable channel shall be placed in either the bypassed or tripped condition within 1 hour. If the inoperable channel is not restored to operable status after the allowable time for bypass (48 hours), it shall be placed in the tripped position."

Contrary to the above, on October 30, 1992, after swapping Power Range Control Channels A and B for the Power Range Safety Channels A and D (following the failure of a detector), the licensee failed to perform adequate post-maintenance testing to determine operability, thus failing to detect that the signal cables for the nuclear instrumentation subchannels were misaligned, causing Channel D Reactor Protective System Trip Units 1, 9, and 12, to remain inoperable until they were detected on March 1, 1993. The licensee failed during this time period to place Channel D trip units in the tripped position.

This is a Severity Level IV violation.

OPPD Response

1. Reason for Violation

This event was detailed in Licensee Event Report (LER) 93-004. A Root Cause Analysis (RCA) was also completed by Omaha Public Power District (OPPD) for this event. The Reactor Protective System (RPS) Channel D trip units were declared inoperable on March 1, 1993 when it was discovered that the Axial Shape Index (ASI) response for Channel D was opposite the other channels. This was due to the two Power Range Nuclear Instrumentation (PRNI) subchannel input cables being reversed. These cables had been moved to Safety Channel D from Control Channel B via Temporary Modification TM-92-078 on October 31, 1992. It has been determined that the subchannel cables for the Control Channel detector had most likely been reversed since initial startup in 1973.

1. Reason for Violation (Continued)

Fort Calhoun had been maintained at a nominal 100% power from installation of the temporary modification until a slow power reduction was initiated on February 24, 1993. The reversed response of Channel D RPS ASI was identified during the evaluation of data from the power reduction. Positive verification of the response of the subchannels after the installation of the temporary modification would have identified the reversed cable problem. Therefore, the cause of the violation was insufficient post-temporary modification testing and insufficient requirements for review of testing specified for temporary modifications. Drawing discrepancies may have contributed to failures to identify the pre-existing wiring problem.

2. Corrective Actions That Have Been Taken

Temporary Modification TM-92-078 was revised to interchange the subchannel input cables for Safety Channel D. After the cables were exchanged, the ASI response for all four RPS Channels was verified to respond correctly by inserting a control rod regulating group. These actions were completed March 1, 1993.

Standing Order O-25, "Temporary Modification Control" has been revised to provide additional guidance on determining functional testing requirements. The revised procedure requires testing requirements to be evaluated for the functions of the affected equipment. Documentation of this evaluation will now be included with the temporary modification package for Plant Review Committee (PRC) review and approval. The revised procedure was issued March 31, 1993.

The adequacy of post-modification testing for temporary modifications installed as of March 1, 1993 was reviewed and confirmed. This was completed March 5, 1993.

The post-modification testing process for permanent modifications was reviewed and determined to be adequate. This was completed March 5, 1993.

3. Corrective Actions That Will Be Taken

Engineering Change Notice ECN-92-057 will correct identified discrepancies on applicable drawings of PRNI detector cabling. These drawing updates will be completed by May 21, 1993.

3. Corrective Actions That Will Be Taken (Continued)

Maintenance Work Order (MWO) 924386 has been initiated for investigation of identified labeling discrepancies involving PRNI cables. This MWO will require verification that labeling is consistent with the approved configuration and will be completed by the end of the 1993 Refueling Outage.

4. Date of Full Compliance

OPPD is presently in full compliance.