

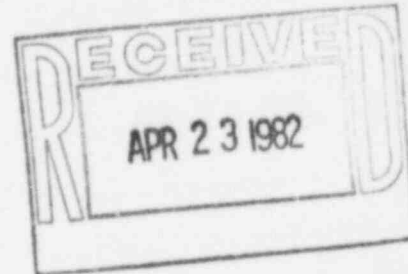


## Omaha Public Power District

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

April 21, 1982  
LIC-82-168

Mr. J. T. Collins, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011



Reference: Docket No. 50-285  
IE Inspection Report 82-02

Dear Mr. Collins:

The subject Inspection Report identified two violations regarding fire brigade training and the operator requalification program at the Fort Calhoun Station. The Omaha Public Power District's responses to these violations are attached.

Unresolved Item 8202-07 to IE Inspection Report 82-02 addresses the concern that the Fort Calhoun Station only conducts one fire brigade drill each calendar quarter. The NRC staff position requires that a fire brigade drill be performed each quarter for each shift brigade. Beginning July 1, 1982, which is the start of a new calendar quarter, the District will conduct quarterly fire drills for each shift fire brigade.

Sincerely,

W. C. Jones  
Division Manager  
Production Operations

### Attachments

cc: U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Washington, D.C. 20555

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

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

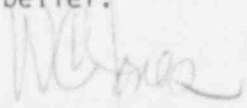
In the Matter of

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

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Docket No. 50-285

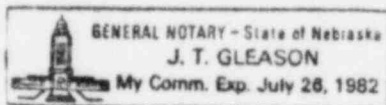
AFFIDAVIT

. . . . . being duly sworn, hereby deposes and says that he is Division Manager - Production Operations 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 IE Inspection Report 82-02; 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.

  
W. C. Jones  
Division Manager  
Production Operations

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 21st day of April, 1982.



  
Notary Public

OMAHA PUBLIC POWER DISTRICT'S  
RESPONSE TO IE INSPECTION REPORT 82-02

Violation A.

Failure to Conduct Required Requalification Training for Operators and Senior Operators

10 CFR 55, Appendix A requires, in paragraph 2, that, "the requalification program shall include preplanned lectures on a regular and continuing basis throughout the license period in those areas where annual operator and senior operator written examinations indicate that emphasis in scope and depth of coverage is needed . . . ." Additionally, 10 CFR 55, Appendix A, in paragraph 4, requires that, ". . . The requalification program shall include . . . written examinations which determine licensed operator's and senior operator's knowledge of subjects covered in the requalification program . . . ." The approved training plan for Fort Calhoun Station requires, in paragraph I.1, that, ". . . individuals who score less than 80% in particular category(ies) will be required to attend the appropriate lectures." Also, paragraph I.2 of the approved training plan for Fort Calhoun Station requires that, "Periodic written quizzes will be given to all lecture study participants to evaluate their knowledge of topics covered by these lectures."

Contrary to the above, four individuals, who were licensed as operators or senior operators and who scored less than 80% in particular categories on the annual written examination given in the spring of 1981, were neither given requalification lectures in their respective areas of weakness nor were they given re-examinations in these areas.

Response

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

The four licensed operators who had scored less than 80% in requalification examination categories have received retraining in those categories and were retested as part of the annual written examination given in late 1981. Three of the four operators successfully completed the examination with a grade of 80% or greater in all categories. The final individual is presently in an accelerated training program and is scheduled for re-examination by April 23, 1982.

2. Corrective steps which will be taken to avoid further items of noncompliance.

The District will re-examine the one remaining individual by April 23, 1982. Additionally, in the future any operators scoring between 70% and 80% on any category during his annual requalification examination will be required to attend lectures on those categories and be re-examined during his next scheduled training cycle. This will ensure that these operators receive prompt attention in identified weak areas.

3. Date when full compliance will be achieved.

The Omaha Public Power District will be in full compliance by April 23, 1982, assuming the above described operator passes the re-examination.

Violation B.

Failure to Follow Training Manual Requirements

10 CFR 50, Appendix B, Criterion V requires that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to this requirement, the following activities affecting safety were not carried out in accordance with the Fort Calhoun Nuclear Power Station (FCNPS) Training Manual (Revision 3 of December 10, 1981).

1. Section 8.2.2.2.c of the FCNPS Training Manual requires that, "each member of the fire brigade will maintain his preparedness for fighting fires by participating in a drill at least every two years."

Contrary to this requirement, 18 members of the fire brigade (5 operators and 13 security guards) who began employment at the FCNPS prior to 1980 did not participate in a fire drill during the 2-year period ending December 31, 1981.

Response to Part 1.

During 1980 and the first part of 1981, the Training Department at the Fort Calhoun Station consisted of one individual who manually compiled and tracked the training records of plant personnel. In early 1981, two individuals were added to the Training Department, one of which was assigned the responsibility of fire brigade training and maintenance of associated records. This individual was necessary to ensure that the fire brigade training program complied with the requirements of the Fort Calhoun Station Fire Protection SER. During this same time period in 1981, the Training Department was in the process of developing a computer tracking system for personnel training that would enhance the management and timeliness of the training records system. However, in July 1981, two of the three Training Department personnel, including the individual responsible for the maintenance of the fire brigade training records, left the District's employment. The District subsequently added two new individuals to the Training Department and completed entering the necessary training record inputs into the computer tracking system as of February 1982.

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

All Fort Calhoun Station fire brigade members participated in a fire drill and respective training during the first calendar quarter of 1982.

2. Corrective steps which will be taken to avoid further items of noncompliance.

The institution of the computer tracking system which documents and identifies all necessary personnel training will ensure that fire brigade drills and training meet schedule requirements.

3. Date when full compliance will be achieved.

The Omaha Public Power District is presently in full compliance.

2. Section 8.1.2.2.b of the FCNPS Training Manual requires that each fire brigade team member qualifies by completion of fire brigade team training and that, "Qualification will be certified by the Training Department."

Contrary to this requirement, the NRC inspector found that certification of fire brigade team members was not being conducted.

Response to Part 2.

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

The District reviewed the records of all fire brigade team members to ensure that the appropriate fire training had been completed. After confirming that initial fire brigade training had been successfully completed by all Fort Calhoun Station brigade personnel, the District issued and filed a letter of certification which documents the completion of this training for all current fire brigade individuals.

2. Corrective steps which will be taken to avoid further items of noncompliance.

The Fort Calhoun Station Training Department will issue and file a letter of certification for all new fire brigade members that successfully complete the initial fire brigade training program.

3. Date when full compliance will be achieved.

The Omaha Public Power District is presently in full compliance.