

Omaha Public Power District
444 South 16th Street Mall
Omaha, Nebraska 68102-2247
402/636-2000

June 27, 1990
LIC-90-0481

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

Reference: Docket No. 50-285

Gentlemen:

Subject: Licensee Event Report 90-17 for the Fort Calhoun Station

Please find attached Licensee Event Report 90-17 dated June 27, 1990.
This report is being submitted on a voluntary basis.

If you should have any questions, please contact me.

Sincerely,



W. G. Gates
Division Manager
Nuclear Operations

WGG/djm

Attachment

c: R. D. Martin, NRC Regional Administrator
A. Bournia, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector
INPO Records Center
American Nuclear Insurers

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION: COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Fort Calhoun Station Unit No. 1

DOCKET NUMBER (2)

050002815

PAGE (3)

1 OF 03

TITLE (4)

Failure to Perform Local Panel Surveillance Required By Inappropriate Technical Specification

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)			
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)	
05	17	90	90	017	000	06	27	90	N		0500000	
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)												
OPERATING MODE (9)			20.402(b)			20.406(e)			50.73(a)(2)(vi)			73.71(b)
POWER LEVEL (10)			20.406(a)(1)(i)			50.38(e)(1)			50.73(a)(2)(v)			73.71(e)
			20.406(a)(1)(ii)			50.38(e)(2)			50.73(a)(2)(vii)			X OTHER (Specify in Abstract below and in Text, NRC Form 366A)
			20.406(a)(1)(iii)			50.73(a)(2)(i)			50.73(a)(2)(viii)(A)			Voluntary Report
			20.406(a)(1)(iv)			50.73(a)(2)(ii)			50.73(a)(2)(viii)(B)			
			20.406(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(ix)			

LICENSEE CONTACT FOR THIS LER (12)

NAME

TELEPHONE NUMBER

AREA CODE

Deborah J. Matthews, Supervisor - Station Licensing

4025331-61871

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

Fort Calhoun Technical Specification 3.6(3)a specifically states for the Containment Spray, Safety Injection, and Shutdown Cooling pumps: "alternate manual starting between control room console and the local panel shall be practiced during refueling outages." These pumps have never had a remote operating panel since initial plant startup, so no testing has been conducted in accordance with this Technical Specification. This condition was verified on May 17, 1990 in response to a request from the Senior Resident Inspector.

An assessment was performed, indicating that there is no current design requirement or licensing basis for a local panel. The lack of the panel and the failure to perform surveillance testing have had no effect on the operability of the associated systems or on plant safety, and no Limiting Conditions for Operations in Section 2.0 of the Technical Specifications have been violated. This report is being submitted voluntarily due to potential industry and NRC interest.

This condition was the result of inadequate identification, updating, and tracking of administrative errors in the Technical Specifications by Omaha Public Power District (OPPD) and NRC. OPPD has improved the processing and tracking of changes to the Technical Specifications in recent years through enhanced administrative guidance and dedication of resources. OPPD will propose a change to Technical Specification 3.6(2)a to delete the requirement for local panel testing.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Fort Calhoun Station Unit No. 1	0 5 0 0 0 2 8 5	9 0	— 0 1 7	— 0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 385A's) (17)

Fort Calhoun Technical Specification 3.6(3)a specifically states for the Containment Spray, Safety Injection, and Shutdown Cooling pumps: "alternate manual starting between control room console and the local panel shall be practiced during refueling outages." These pumps have never had a remote operating panel since initial plant startup, so no testing has been conducted in accordance with this Technical Specification.

On May 16, 1990, the NRC Senior Resident Inspector requested that Omaha Public Power District (OPPD) demonstrate compliance with Technical Specification 3.6(3)a. The nonexistence of the remote panel and the associated failure to perform Technical Specification surveillance testing were verified on May 17, 1990. The plant was in a refueling outage at this time.

Research was conducted into the reasons for this condition. An assessment was performed, indicating that there is no current design requirement or licensing basis for a local panel. Design documentation indicated that the drawing which would have contained the panel had it existed was revised in 1968 as Revision 1, which shows no panel. Revision 0 of the drawing could not be located. The existence of an alternate means of operating the pumps was indicated in the Preliminary Safety Analysis Report (PSAR) for Fort Calhoun Station. It was determined that the surveillance statement, in roughly the same form, was a part of the Technical Specifications contained in the Final Safety Analysis Report (FSAR), as originally proposed for licensing in 1971.

No credit is taken for remote starting capability of the Containment Spray, Safety Injection, or Shutdown Cooling Pumps for any of the Updated Safety Analysis Report (USAR) Section 14 postulated accidents. In the only credible scenario affecting this equipment, direction is provided in an Abnormal Operating Procedure (AOP-6) for stopping a pump via operation of the breaker. Also, there was no reference to a local operating panel for these pumps found in any other section of the USAR. Thus, the lack of the panel and the failure to perform surveillance have had no effect on the operability of the associated systems or on plant safety, and no Limiting Conditions for Operations in Section 2.0 of the Technical Specifications have been violated.

In response to a 1976 violation from the NRC, OPPD's corrective action included proposing numerous changes to the Section 3 surveillance requirements of the Technical Specifications, mainly involving the addition of specific operating mode applicability statements for each surveillance. OPPD submitted an application for amendment in 1977, and supplemented that application in 1978. During the review of that specification, the issue of a local panel was raised during, according to records, a telephone conversation between the OPPD Licensing staff and the NRC Project staff at that time. A revised version of the Facility License Change was prepared to remove reference to the nonexistent panel, and make the Specification consistent with the ASME requirements for pump testing.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Fort Calhoun Station Unit No. 1	DOCKET NUMBER (2) 0 5 0 0 0 2 8 5	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 305A's) (17)

Subsequent conversations were held with the NRC staff concerning the scope and content of the amendment application. During those conversations, it was ascertained that the application was going to result in an extensive revision of the Surveillance section of the Fort Calhoun Station Technical Specifications. It was recommended that OPPD seriously consider Standard Technical Specifications in lieu of such a comprehensive application. At that time, OPPD did not wish to adopt Standard Technical Specifications and began looking at other means of attaining the objective without a complete change to Section 3 of the Technical Specifications.

Several personnel changes took place in the OPPD Licensing area (the group responsible for processing of proposed changes to the Technical Specifications) and within the NRC staff associated with Fort Calhoun Station. Additionally, the NRC issued guidance and a generic letter relative to the section of Technical Specifications concerning performance of surveillances. OPPD decided to add a section to the opening of Section 3 similar in wording to that contained in Section 4.0 of the Standard Technical Specifications. As a result, in 1985 the original application was reduced from about 100 pages to 3. Conversations with the Project Manager at the time of submittal indicated that the NRC had closed the original application file, as no action had been taken relative to it for several years.

Thus, the application made in 1985 was reviewed by the NRC independent of various changes and corrections made to the 1978 version. Consequently, the intention to correct the specification which contained reference to a nonexistent panel was not reflected in the final version of the Technical Specifications as approved by NRC. The issue remained dormant until raised by the Senior Resident Inspector in 1990.

This condition was the result of inadequate identification, updating, and tracking of administrative errors in the Technical Specifications by OPPD. As noted previously in this report, there was no safety significance associated with this condition. This report is being submitted voluntarily due to potential industry and NRC interest. OPPD does not consider the failure to perform surveillance testing on nonexistent equipment as an operation or condition prohibited by Technical Specifications; therefore, this event is not reportable pursuant to 10 CFR 50.73.

OPPD has improved the processing and tracking of changes to the Technical Specifications in recent years through enhanced administrative guidance and dedication of resources. OPPD will propose a change to Technical Specification 3.6(3)a to delete the requirement for local panel testing. This proposal will be submitted by September 28, 1990.

There have been no other LER's submitted for failure to perform surveillance testing on nonexistent equipment.